CITY OF MORGAN HILL

STORM WATER MANAGEMENT PLAN

FISCAL YEARS 2004-2009

NOVEMBER 1, 2004

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INTRODUCTION

Purpose

This Storm Water Management Plan is prepared to meet the Phase II Storm Water Permit requirements for small municipal separate storm sewer systems (MS4s) for the City of Morgan Hill. The Plan will be implemented to satisfy the general permit requirements issued by the State of California Water Resources Control Board (State Board) and administered by the Central Coast Regional Water Quality Control Board (RWQCB).

The purpose of the storm water program is to establish a comprehensive effort by the City of Morgan Hill to help prevent the discharge of pollutants to surface water bodies by limiting the role storm water runoff plays as the vehicle for pollution.

Background

In 1972, the Federal Water Pollution Control Act (also referred to as the Clean Water Act [CWA]) was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The 1987 amendment to the CWA established a framework for regulating storm water discharges under the NPDES program. Phase I requirements were issued by the U.S. Environmental Protection Agency (EPA) on November 16, 1990. Large and medium municipal separate storm sewer systems (those serving 100,000 people or more) were regulated under the Phase I requirements. In addition, the Phase I rule required permit coverage for construction activity disturbing five acres of land or greater.

On December 8, 1999, the EPA issued Phase II Regulations that would apply to small MS4s, which are defined as any MS4 not covered under the Phase I rule. The City of Morgan Hill is a "regulated small MS4". Phase II Regulations require that designated small MS4s obtain coverage under a Regional Board issued general permit by March 10, 2003. Construction activity on sites one acre and larger will now require permit coverage under the Phase II rule.

The State of California carries out the Storm Water Regulations according to the California Water Code Section 13399. The program is administered by the RWQCB under the authority of the EPA. *The State adopted the final draft of the General Permit on February 4, 2003.* The City of Morgan Hill, as a designated MS4, is required to file a Notice of Intent with the RWQCB to be covered under the statewide General Permit. Regulated Small MS4s that fail to obtain coverage under the General Permit will be in violation of the CWA and the Porter-Cologne Water Quality Control Act.

Development and Implementation of the Storm Water Management Plan (Plan)

Under the terms of the Permit, the permittee (City) is required to develop and implement a Storm Water Management Plan (Plan) which will be submitted with the Notice of Intent. The main goal of the City's Plan is to protect water quality from the impacts of storm water runoff. The intent is that storm water quality impacts will be considered in all aspects of a

municipality's activities and that multiple departments within the municipality will work together to meet the water quality objectives.

The Plan is a "living document," which means that it is expected to be altered and improved upon during the life of the permit. The document will evolve as the City better understands what methodologies and practices prove to be most effective.

To ensure common goals and continuity throughout the state, the RWQCB has established a framework of six (6) Minimum Control Measures (MCM) which becomes the backbone for every MS4's Storm Water Plan. The six MCMs are listed below and must be addressed in every MS4's Plan.

1. Public Education and Outreach: The Permittee must educate the public in its permitted jurisdiction about the importance of the storm water program.

2. Public Involvement and Participation: The Permittee must comply with all state and local notice requirements when implementing a public involvement/participation program.

3. Illicit Discharge Detection and Elimination: The Permittee must adopt and enforce ordinances or take equivalent measures that prohibit illicit discharges.

4. Construction Site Runoff Control: The Permittee must develop a program to control the discharge of pollutants from construction sites greater than or equal to one acre in size in its permitted jurisdiction.

5. Post Construction Site Runoff Control: The Permittee must require long-term post-construction best management practices that protect water quality and control runoff flow, to be incorporated into development and significant redevelopment projects.

6. Pollution Prevention/Good Housekeeping: The Permittee must examine its own activities and develop a program to prevent the discharge of pollutants from these activities.

To effectively implement the six MCMs, the City will employ a variety of Best Management Practices (BMP) to reduce impacts from storm water runoff to the maximum extent practicable. BMPs are policies, actions, and/or physical measures taken to reduce pollutant infiltration into the storm sewer system. There are a wide variety of BMPs that best fit the individual MCMs. The City's Plan will incorporate BMPs that prove to be the most effective at meeting the overall objective of limiting the impacts of storm water impact on receiving water bodies.

The City of Morgan Hill shall begin implementing the Plan immediately. Full implementation of the Plan shall be complete at the end of the five year term of the Permit.

Reporting

The City of Morgan Hill will monitor the progress and effectiveness of the Plan and report back to the RWQCB annually. Annual reports shall be submitted by September 15th of each year beginning in 2005 for the life of the permit. Included in the report shall be an evaluation of compliance with Permit requirements, a summary of activities planned for the next reporting period, and, if necessary, proposed changes to the Plan.

Timeline

Following acceptance by the RWQCB, the Plan will be revised on a yearly basis following the City's fiscal year of July 1st through June 30th. A draft revised program will be prepared by staff by February 15th for budget consideration. The updated plan will begin implementation by July 1st of that year.

Annual reports will be submitted to the Central Coast Regional Water Quality Board by September 15th of each year with the first report to be submitted by September 15, 2004. Activities performed throughout the reporting period of July 1st through June 30th will be summarized in the annual report.

Sharing of Resources with Other Agencies

The RWQCB highly encourages small MS4s to share resources with other agencies where possible to effectively implement the Storm Water Management Plan. It is believed that such cooperation makes for a more harmonious execution of water quality measures. Drainage areas, channels, and streams cross jurisdictional boundaries and, thus, a regional cooperation is a sound approach to addressing storm water runoff issues.

The City of Morgan Hill will cooperate with and utilize the resources of other agencies to aid in implementing its Plan. The Santa Clara Valley Water District (SCVWD) has a wealth of expertise in water quality issues and has offered the use of its own staff for training City personnel and educating the public. In addition, the SCVWD has produced flyers, brochures, and other public noticing media that they have agreed to share with the City. To meet the public outreach MCM, the City will participate with the SCVWD on television and radio public service announcements, since that agency already provides such outreach and has agreed to accept our participation.

Close coordination of our program with the current program of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), which is performing a similar function in the south Bay Area, will result in a more effective communication link with the public. SCVURPPP is a multi-jurisdictional cooperative effort among the SCVWD, the County of Santa Clara, and thirteen north county cities, all working to improve the water quality of the South San Francisco Bay and the streams of Santa Clara County, by reducing non-point source pollution in storm water runoff and other surface flows. As part of the District's Clean, Safe Creeks and Natural Flood Protection program, approximately $40,000 per year of their budget is targeted at south Santa Clara County and, more specifically, the cities of Morgan Hill and Gilroy.

The City of Morgan Hill will also partner with the City of Gilroy and the South County Regional Wastewater Authority (SCRWA). The cities of Gilroy and Morgan Hill are of similar size and have similar storm runoff issues. Staff from both cities will cooperate in sharing material and Best Management Practice experiences. SCRWA is a joint authority between Morgan Hill and Gilroy and is the umbrella agency that oversees the sewage treatment plant for both agencies. Among other resources available to Morgan Hill is SCRWA's internal Chemical Control Unit, which has the responsibility for monitoring illegal wastewater discharges and enforcing compliance. This Chemical Control Unit can be called upon to monitor suspected illicit discharges into the storm sewer system.

Description and History of the Service Area

The City of Morgan Hill is located in the Santa Clara Valley, approximately 12 miles south of the City of San Jose and 10 miles north of the City of Gilroy. Geographically, Morgan Hill lies in the southern Santa Clara Valley and encompasses the eastern foothill slopes of the Santa Cruz Mountain range and the western foothill slopes of the Mt. Hamilton range, and the broad, flat alluvial plain between them. Elevations range from approximately 350 feet on the valley floor to over 1,200 feet in the foothills. The dominant soil types are upland soils developed on sedimentary, basic igneous, and serpentine rock, the slow to very slow draining subsoils of the alluvial fans, and the moderately well to rapid draining medium to fine textured soils of the alluvial plain. Soil cover and vegetation in the area include a wide range of trees, thick brush, and grass.

The City of Morgan Hill is situated on the drainage divide between the San Francisco Bay and Monterey Bay. The majority of the valley floor slopes down southward and drains into the Pajaro River and Monterey Bay. A portion of the valley floor slopes down northward and drains into Fisher and Coyote Creek, and thence to the San Francisco Bay. The wet season in Morgan Hill occurs from late October through early April, although the largest storm events typically occur in December, January, and February. The mean annual precipitation is approximately 17 inches.

Prior to the arrival of Spanish expeditions en route from Mexico, peaceful tribes of Indians inhabited the lush Santa Clara Valley. Under Spanish and Mexican jurisdictions, which were instituted in 1778, a vast region that includes present day Morgan Hill remained one of the most substantial Spanish land grants for nearly three quarters of a Century.

In 1845, Martin Murphy Sr. acquired 9,000 acres known as the Rancho Ojo de Aqua de la Coche. Murphy had been a leader of the first party of pioneers to cross the Sierra Nevada range at Truckee Pass. The Murphy family made their home in the valley below El Toro Mountain. By 1870, Martin's seven sons and daughters managed to acquire more than 70,000 acres.

In 1851, the youngest son, Daniel, married Maria Fisher, heiress to the neighboring 19,000 acre Rancho Laguna Seca. Diana, their daughter secretly married Hiram Morgan Hill in 1882. When Daniel Murphy died, Diana inherited 4,500 acres of their original rancho in the shadow of El Toro.

By 1886, the growing community had a population of 259 with a post office, depot, two hotels, a restaurant and several churches and shops. Morgan Hill became incorporated on November 10, 1906. By 1909, the population had risen from 250 to 1000. Currently Morgan Hill has a population of approximately 35,000.

Morgan Hill was established as an agricultural center in the 19th Century and retains many of those roots today. As an "edge community" to Silicon Valley, Morgan Hill combines high tech with conventional manufacturing firms to generate an industrial mix. Morgan Hill's top three employers are Anritsu (1,000 employees), Morgan Hill Unified School District (840 employees), and Abbott Laboratories (550 employees).

Despite the population growth of the last few decades, there is much undeveloped land in the area. Agriculture and open land remains an important component in regions outlying the urbanized core. Control of agricultural runoff is not included in this Plan.

Storm Water Runoff

Controllable storm water runoff from the Morgan Hill area is generated by three main land use components: residential development (including apartments and single-family homes), commercial activities, and light industrial activities. The City of Morgan Hill operates its own storm drainage system which consists of a combination of curb and gutter facilities, curb inlets, underground pipelines, and bubblers draining to the nearest creek or to manmade natural detention basins. Because of the recent development of non-agricultural industry and a vigorous monitoring and enforcement program by the South County Regional Wastewater Authority (SCRWA) Chemical Control Unit, industrial waste discharges are properly placed in the sewage treatment system, thus limiting their impact on storm water runoff. Storm water discharges, therefore, are largely of a non-industrial character, so public education and participation are considered important components in the overall program of pollution prevention.

This Plan targets the type of storm water pollution most commonly encountered in commercial and residential areas. Runoff from impervious areas carry contaminants, including litter, road oils, pet waste, fine sediment and/or turbidity from construction sites, phosphorus or eutrophication from residential landscaping runoff to watercourses. It has also been observed that litter is commonly found wherever people have access to drainage courses. The Plan targets these concerns by implementing various controls, the effectiveness of which will be evaluated as the Plan is implemented.

Total Maximum Daily Loads (TMDL's)

Pursuant to the provisions of California's Porter Cologne Water Quality Control Act and the federal Clean Water Act, the State and Regional Water Quality Control Boards establish water quality standards, including designated (beneficial) uses and criteria or objectives to protect those uses. Section 303(d) of the Clean Water Act requires states to identify certain waters within their borders that are not attaining water quality standards and to establish the total maximum daily load (TMDL) for certain pollutants impairing those waters. A TMDL is a numerical calculation of the amount of a pollutant that a water body can assimilate and still meet standards.

Llagas Creek has been identified as an impaired water body and will be subject to TMDL limitations. The TMDL's have not been established yet by the Board for Llagas Creek. When the TMDL's are established for Llagas Creek, urban runoff may be formally identified as a source of impairment. The City of Morgan Hill will be required to amend this SWMP to address the TMDL's once they are established.

Minimum Control Measure #1
PUBLIC EDUCATION AND OUTREACH

Introduction

A Phase II storm water plan must incorporate a public education program that educates the public on the impacts of storm water discharges on water bodies and the steps that they can take to reduce pollutants in storm water runoff. The City's intent is to institute a public education and outreach program that generates greater support for the program. As the public gains a greater understanding of the reasons why it is necessary and important to comply with the program, they will become more aware of the personal responsibilities expected of them and others in the community. The goals of the plan are to 1) educate residents on the local waterbodies and how to protect those waterbodies; 2) change behaviors that negatively impact watersheds; 3) promote public involvement in watershed stewardship; and 4) reach bilingual audiences. The City will utilize current, on-going programs that address the requirements of this minimum control measure. Close coordination of our program with the current program of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), which is *already* performing a similar function in the south Bay Area, will result in a more effective communication link with the public.

A. Mass Media

By partnering with SCVURPPP, the City of Morgan Hill takes advantage of a multi-faceted campaign that reaches all sectors of the community in a cost effective way. SCVURPPP has found that use of the mass news media (television and radio) has been more effective than mass mailings to convey the storm water message, and has an on-going program in the south Bay Area. Radio and television advertisements reach a large and diverse audience. The City of Morgan Hill will participate with SCVURPPP by financially contributing to SCVURPPP activities that are already reaching Morgan Hill audiences. Acting alone, the City would not have the financial resources to provide quality mass media messages that reach its citizens. By contributing financially to the SCVURPPP program, the City becomes a partner in a proven media campaign and helps meet the City's measurable goal of 10 spots per year. The City's financial contribution will come by way of utilizing a portion of the SCVWD's Safe Creeks and Streams funds for the South County. Funds for the Safe Creeks and Streams program are collected from citizens residing in the County, including residents of Morgan Hill. Therefore, a portion of those funds must be directed to supporting storm water quality in the South County area.
The City provides direction to the SCVWD on how to expend those funds. The SCVURPPP mass media program gives Morgan Hill access to TV, radio, and transit advertising. TRG & Associates, a consulting firm specializing in environmental public outreach, and the Watershed Management Initiative develop SCVURPPP's Mass Media Campaign Work Plan

for Watershed Watch. The Watershed Watch Work Plan includes radio, print, and transit advertising. Got Bugs transit and print ads in English and Spanish appear on Valley Transportation Authority buses that services residents of Morgan Hill through Viacom Outdoor and in local newspapers such as the San Jose Mercury News. Got Paint print and radio ads appear in local newspapers and on local radio stations such as KLOK/KBRG (Spanish radio), KBAY, and KRTY. Watershed Watch partners with the radio and television stations to gain donated air time that the station had unscheduled. Purchasing advertising time is done by request-for-proposal (RFP) process. Through this RFP process, radio and television stations will offer additional air time over and above the paid advertisements to get the advertising contract. This additional 'bonus spot' air time is considered 'added value' because it is advertising that SCVURPPP does not have to pay for. According to the Mid-Year Campaign and Media Report for July 2003 to December 2003, total gross impressions were 3,045,600, the net advertising budget was $71,874, and the added value of bonus spots was $126,500. Page 6 of the Mid-Year Campaign and Media Report for July 2003 to December 2003 is copied here to provide sample information regarding gross impressions, advertising budget, and added value. Information on ad duration, broadcast time of day, and ad content are not included below due to the varying nature of these items.

Gross Impressions

Gross Impressions are the sum of the average audience for all advertisements within a given schedule. In other words, average persons multiplied by the number of the total spots equals gross impressions. For example, if KLOK runs 10 spots in the morning where there are 5,000 listeners in quarter hour slots, the gross impression is 50,000.

The following shows the gross impressions during the July – August 2003 period:

SJ Mercury News	Adults 18+	16,092,000
Viacom-Transit	Adults 18+	12,696,000
KBAY	Adults 18+	1,209,600
KRTY	Adults 18+	1,144,400
KLOK	Hisp. Adults 18+	379,600
KBRG	Hisp. Adults 18+	1,524,000
Total Gross Impressions		**33,045,600**

Net Advertising Budget

The following amounts were spent on advertising during the summer flight:

San Jose Mercury News	$27,253.50
Viacom Transit	$13,000.75
KBAY	$10,812.00
KRTY	$10,795.00
KBRG	$ 7,854.00
KLOK	$ 2,159.00
Total Summer Advertising Budget	**$71,874.25**

Added Value

The following shows the added value of bonus spots, PSAs and promotions for the various media partners:

SJ Mercury News	6 ads/15,000 inserts	$34,000
KBAY	91 spots, WW quiz	$25,700
Viacom-Transit	100 buses – 4-wk override	$25,200
KRTY	232 spots, Car Wash promo	$22,600
KBRG	68 spots, Paramount Sponsor	$11,715
KLOK	40 spots, Paramount Sponsor	$ 7,285
Total Added Value		**$126,500**

During all five years, the City will air ten local public cable service messages. This parameter will be measured by the number of public service announcements made on radio and television. Messages may be posted on local cable channel 17, the California Channel, and local cable channel 19, Morgan Hill Access Television. This parameter will be measured by the number of public service announcements made on radio and television. The most recent Mid-Year Campaign and Media Report with gross impressions data will also be provided to the Board as part of our annual report as an indicator of the effectiveness of this BMP.

B. Brochures and Fliers

Brochures and fliers for all ages of the general public and specific audiences will be obtained from SCVURPPP and used for public distribution in Morgan Hill. Stickers with City hotline phone numbers will be attached to the back of the flyers. Some of the flyers and brochures available for City use carry the following themes: "The Bay Begins at Your Front Door," "Keeping It All In Tune," and "Home Maintenance Tips for a Cleaner Bay." Another one of the SCVURPP brochures, "Creek Connections", will be highly applicable for the annual Coastal Cleanup Day and annual National River Cleanup Day. It is also planned to use brochures applicable to the Monterey Bay area including "Monterey Bay Begins on Your Street." Representatives from the City of Monterey and the Monterey Regional Storm Water Permit Participants Group have authorized purchasing brochures.

Fliers will also be produced by City staff. A two-page flier on local opportunities titled "Storm Water Pollution Prevention – Public Participation Opportunities" is updated annually and will be produced in English and Spanish. "Be Kind to Animals" is a 12-page coloring book to teach children how to help keep Morgan Hill's water bodies, and storm drains clean.

In order to reach applicable commercial and industrial establishments that potentially discharge to waterways, the City will provide informational brochures addressing concerns. Outreach could include motor vehicle dealerships, repair shops, restaurants, and other commercial and industrial establishments that handle materials that should not be discharged into water ways. Informational brochures can be an educational tool provided during inspections or investigations into illicit discharge complaints.

Brochures can be distributed at public events, mailed to residents and businesses upon request, and are already available at kiosks and displays at City Hall and at the Public Works Department. During the first and second year, the City of Morgan Hill will make available for distribution 1,500 brochures, 500 coloring books, and 1,000 miscellaneous handouts. During the third year, those numbers will grow to 2,000 brochures, 700 coloring books, and 1,500 miscellaneous handouts. Finally, should the program remain effective, during the fourth and fifth year, the City will produce 2,500 brochures, 900 coloring books, and 2,000 miscellaneous handouts. This parameter will be measured by the number of brochures, coloring books, and miscellaneous handouts distributed.

List of Currently Available Storm Water Publications at our Kiosks

Storm Water Pollution Prevention Public Participation Opportunities…….Flier

Monterey Bay Begins on Your Street……...Brochure

The Bay Begins at Your Front Door…… Brochure

Keeping It All in Tune…….Brochure

Home Maintenance Tips for a Cleaner Bay……Brochure

Creek Connections……..Newsletter

Be Kind to Animals…….Coloring Book

Coastal and Marine Educational Resources……..Brochure

Adopt-A-Creek – Together We Can Make a Difference……Brochure

Why Do People Dump Their Trash in Creeks?.....Brochure

C. Public Events

The City of Morgan Hill will participate in two local community festivals per year by operating a booth to distribute literature and explain the storm water management program. These two events will be chosen from: the Hiru Matsuri Spring Taiko Festival in April, Public Works Week in May, the Morgan Hill Mushroom Mardi Gras in May, the South County Business Expo in June, the Taste of Morgan Hill in September, and the weekly Saturday Morgan Hill Farmer's Market. Free giveaways and face painting for children have attracted hundreds of residents to the storm water display at the annual Taste of Morgan Hill event. Public events are also a great opportunity to perform formal and informal surveys and to get public feedback on program elements. Local residents and elementary and high school students have volunteered at previous booths. Depending on availability, entertainment promoting environmental awareness such as the Banana Slug String Band may be employed to put on a musical program that explains the virtues of ecosystem protection in a fun, interactive format.

Booths at public events will be staffed by individuals and volunteers knowledgeable about the City's storm water quality program. During each of the five years, the City will set up an educational booth at two public events in Morgan Hill.

This parameter will be measured by the number of events that presented the educational booth, the estimated number of visitors to the storm water booth at the event, and the number of interested residents that signed up for our mailing list to be notified for volunteer events.

D. Classroom Education

Morgan Hill Unified School District and local private elementary schools including Morgan Hill Country School, Carden Academy, Saint Catherine's School, Crossroads Christian School, and Shadow Mountain Baptist School will be invited to participate in a mutually acceptable plan for educating school-aged children, adults, and Latinos from grades 2 though college about storm water pollution prevention practices.

The classroom education program, including games, songs, lessons, presentations, videos, and CD Roms are available from the SCVWD. The City of Morgan Hill will participate with SCVURPPP by contributing to SCVURPPP activities at the schools. During the 2002 to 2003 School Outreach Program presented by the SCVWD, visits to schools included Charter School (which recently moved to the City of San Jose), Morgan Hill Country School, and Solid Foundation, an education association for home schoolers. A teacher newsletter title "Aquacycles" advertises the program. It is anticipated that the storm water education will be presented in one to two hour blocks at the schools.

During the first year, the City will meet with school officials to determine if a mutually acceptable program can be assembled. During the second through fifth years, the City will bring the educational program to a minimum of two schools per year. We anticipate that three schools will be willing to participate each year. The City will urge each participating classroom to get 1 hour of instruction per year. Students from schools that elect not to participate in the storm water educational program will still receive storm water education through publicly available brochures, coloring books, and fliers. This parameter will be measured by the number of classes that participate in municipal sponsored storm water workshops, the number of students in those classes, and the hours of storm water education that they receive.

E. Partnership with SCVWD on Public Awareness Event

The City assisted the SCVWD with three workshops on the Magic of Water. The Magic of Water is a presentation on the water cycle, non-point pollution, water quality, stream stewardship, and watershed awareness.

F. Web Site

The City will attempt to utilize existing web site materials from agencies such as the City of Los Angeles and the City of Monterey who have agreed to share this information. The City's Storm Water Plan web site will be accessible from the Public Works home page and linked by the City's website. Local information would also be included. The website will be featured during years one through five. It is planned to post a minimum of five articles on storm water

pollution prevention each month with new articles added quarterly. Articles include Storm Water Related Volunteer Opportunities, Public Participation Opportunities, Car Care for Do-It Yourselfers in English and Spanish, Home Maintenance Tips, Home Repair and Remodeling, Landscaping and Gardening, Painting and Application of Solvents and Adhesives, and Pest Control Tips. Four links to other websites will be made, including the Santa Clara Valley Water District's Creek Connections website and Watershed Watch website, the City of Monterey Website, and the Environmental Protection Agency's website. The website will be updated quarterly and maintained on a regular basis. The website will be the public's complete and up-to-date listing of events and services. Copies of the website will also be printed out and available on the storm water brochure kiosk at City Hall for individuals who do not have internet access. This parameter will be measured by the number of storm water related articles posted.

G. Teleworks Messages

Teleworks is an Automated Citizen Information System (ACIS) designed to extend government operating hours by increased general information access. This service describes the City's programs and services and provides answers to frequently asked questions via the Internet. In addition, users can request documents via fax. If residents and other users of the system have questions about Storm Water Quality issues, Teleworks will provide information to them. Examples of available subjects include: Storm Drains and Drainage Ditches, Storm Water Pollution Prevention Information, Conserving Natural Resources – Motor Oil, Protecting Our Riparian Habitat – Coastal Cleanup Day, and Watershed Education. The Teleworks message will be updated when new information becomes available or the answer to a given inquiry changes. The message center will interface with a portion of the City's website, however, linking it to the storm water section of the website is not possible at this time. Teleworks messages will be featured during years one through five. This parameter will be measured by the number of storm water related topics posted. The number of inquiries received to Teleworks will be also reported for informational purposes.

H. Used Oil Disposal

Used oil and filters are collected biweekly as a component of the City's curbside recycling program. The City receives monthly reports on the amount of materials recycled through this program. In addition, for those residents not served by the curbside program, there are two local drop-off locations and additional opportunities for used oil recycling through the Countywide Household Hazardous Waste Management Program. One drop off location is at Speedee Oil Change and Tune Up at 890 Tennant Station. They accept both oil and filters Monday through Saturday from 8 a.m. to 6 p.m. and on Sunday from 9 a.m. to 4 p.m. Another drop off location is Kragen Auto Parts at 16060 Monterey Road. They only accept oil from 8 a.m. to 8 p.m. Monday through Saturday and from 8 a.m. to 7 p.m. on Sunday. One of the primary goals of the curbside recycling program is to eliminate residential waste oil dumping into storm drains. Information about the availability of this program is featured periodically in City communication outlets and is provided by the County Recycling Hotline and the County Household Hazardous Waste Hotline. This parameter will be measured by the number of gallons of oil collected by the City's curbside recycling program.

I. Household Hazardous Waste Collection

The City participates in the Countywide Household Hazardous Waste Program via a formal agreement. Residents and small businesses can bring their hazardous waste to one of the different locations in the County several days per month. The nearest location is San Martin Transfer and Recycling at 14070 Llagas Avenue. Drop-offs are by appointment only between 8:30 a.m. and 4:30 p.m. to prevent unauthorized drop-offs and to ensure safe collection by professional staff. Drop-off days published in 2004 for the San Martin Transfer Station are February 6, February 7, March 5, March 6, April 2, April 3, April 30, May 1, June 4, and June 5. Other locations available to Morgan Hill residents are in San Jose, Sunnyvale, Santa Clara, Cupertino, and West Valley. Household Hazardous Waste disposal is run by the County of Santa Clara and NorCal Waste Systems. NorCal Waste Systems determines the hours, days, and location of operation of the transfer station. Information about the availability of this program is featured periodically in City communication outlets and is provided by the County Recycling Hotline and the County Household Hazardous Waste Hotline. Household Hazardous Waste Collection reduces the amount of hazardous waste disposed of illegally. This parameter will be measured by the amount of hazardous waste that is collected.

TABLE 1 – PUBLIC EDUCATION AND OUTREACH

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
1A Mass Media Participate with Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPP) in their Watershed Watch Program.	Radio and television advertisements reach a large and diverse audience.	Utilizing SCVWD Safe Creeks and Streams funds, coordinate with SCVURPPP to participate financially in radio and television advertisements. Goal of 10 advertisements per year.	Yrs. 1-5: Participate with SCVURPPP on their radio and television ad campaign. Obtain credit for Morgan Hill of 10 spots per year or as many as funding will provide.	Report in Annual Report the financial contribution from Morgan Hill and the number of spots aired in which Morgan Hill was considered a participant.	N/A
1A Mass Media Participate with Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPP) in their Watershed Watch Program.	Radio and television advertisements reach a large and diverse audience.	Place storm water quality advertisement on local cable stations (channels 17 and 19) 10 times per year.	Yr. 1: Television and radio media spots. Local cable public service message 10 times	Number of spots aired.	Estimated number of viewers (gross impressions).
1A Mass Media Participate with Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPP) in their Watershed Watch Program.	Radio and television advertisements reach a large and diverse audience.	Place storm water quality advertisement on local cable stations (channels 17 and 19) 10 times per year.	Yr. 2: Television and radio media spots. Local cable public service message 10 times	Number of spots aired.	Estimated number of viewers (gross impressions).
1A Mass Media Participate with Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPP) in their Watershed Watch Program.	Radio and television advertisements reach a large and diverse audience.	Place storm water quality advertisement on local cable stations (channels 17 and 19) 10 times per year.	Yr. 3: Television and radio media spots. Local cable public service message 10 times	Number of spots aired.	Estimated number of viewers (gross impressions).
1A Mass Media Participate with Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPP) in their Watershed Watch Program.	Radio and television advertisements reach a large and diverse audience.	Place storm water quality advertisement on local cable stations (channels 17 and 19) 10 times per year.	Yr. 4: Television and radio media spots. Local cable public service message 10 times	Number of spots aired.	Estimated number of viewers (gross impressions).
1A Mass Media Participate with Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPP) in their Watershed Watch Program.	Radio and television advertisements reach a large and diverse audience.	Place storm water quality advertisement on local cable stations (channels 17 and 19) 10 times per year.	Yr. 5: Television and radio media spots. Local cable public service message 10 times	Number of spots aired.	Estimated number of viewers (gross impressions).

TABLE 1 – PUBLIC EDUCATION AND OUTREACH

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
1B Brochures and Fliers Brochures, fliers, coloring books, and handouts promoting Storm Water Quality. Some handouts will be in Spanish.	Education material provided to citizens of all ages will raise awareness of storm water quality.	Hand out some type of education handout to a minimum of 3% of City population in Yrs. 1 & 2. Current population = 34,785.	Yr. 1: Produce 1,500 brochures, 500 coloring books, and 1,000 misc. handouts.	Number of brochures, coloring books, and miscellaneous handouts produced.	Number/percent of storm water materials distributed each year. Does it meet 3% of population?
1B Brochures and Fliers Brochures, fliers, coloring books, and handouts promoting Storm Water Quality. Some handouts will be in Spanish.	Education material provided to citizens of all ages will raise awareness of storm water quality.	Hand out some type of education handout to a minimum of 3% of City population in Yrs. 1 & 2.	Yr. 2: Produce 1,500 brochures, 500 coloring books, and 1,000 misc. handouts.	Number of brochures, coloring books, and miscellaneous handouts produced.	Number/percent of storm water materials distributed each year. Does it meet 3% of population?
1B Brochures and Fliers Brochures, fliers, coloring books, and handouts promoting Storm Water Quality. Some handouts will be in Spanish.	Education material provided to citizens of all ages will raise awareness of storm water quality.	Hand out some type of education handout to a minimum of 4% of City population in Yr. 3.	Yr. 3: Produce 2,000 brochures, 700 coloring books, and 1,500 misc. handouts.	Number of brochures, coloring books, and miscellaneous handouts produced.	Number/percent of storm water materials distributed each year. Does it meet 4% of population?
1B Brochures and Fliers Brochures, fliers, coloring books, and handouts promoting Storm Water Quality. Some handouts will be in Spanish.	Education material provided to citizens of all ages will raise awareness of storm water quality.	Hand out some type of education handout to a minimum of 5% of City population in Yrs. 4, & 5.	Yr. 4: Produce 2,500 brochures, 900 coloring books, and 2,000 misc. handouts.	Number of brochures, coloring books, and miscellaneous handouts produced.	Number/percent of storm water materials distributed each year. Does it meet 5% of population?
1B Brochures and Fliers Brochures, fliers, coloring books, and handouts promoting Storm Water Quality. Some handouts will be in Spanish.	Education material provided to citizens of all ages will raise awareness of storm water quality.	Hand out some type of education handout to a minimum of 5% of City population in Yrs. 4, & 5.	Yr. 5: Produce 2,500 brochures, 900 coloring books, and 2,000 misc. handouts.	Number of brochures, coloring books, and miscellaneous handouts produced.	Number/percent of storm water materials distributed each year. Does it meet 5% of population?

TABLE 1 – PUBLIC EDUCATION AND OUTREACH

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
1C Public Events Establish educational booth at two public events each year. Possible events include Hiru Matsuri Spring Taiko Festival in April, Public Works Week in May, the Morgan Hill Mushroom Mardi Gras in May, Taste of Morgan Hill in September, and the weekly Saturday Morgan Hill Farmer's Market.	Establishes visibility at public events and allows for distribution of educational materials.	An individual knowledgeable about the City's storm water quality program will be available at the booth.	Yr. 1: Set up educational booth at two public events in Morgan Hill each year.	Number of public events where storm water booth was present.	Number of brochures, information packets handed out at each event.
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1D Classroom Education Engage local school district officials about bringing storm water quality education into the class room.	Educating students on storm water and water quality practices will help promote better awareness.	The local school district and private schools will be approached during Yr. 1 to craft a plan for educating grade students about water quality.	Yr. 1: Meet with school district officials to determine if a mutually acceptable program can be assembled.	Meeting(s) held.	Education goals determined, format and time frame established, and a list of schools prepared.
1D Classroom Education Bring educational program to two local schools annually.	Educating students on storm water and water quality practices will help promote better awareness.	Present a storm water quality education program to two local schools in the Morgan Hill area. Program to be one hour minimum.	Yr. 2: Bring educational program to two local schools.	Number of classrooms receiving education. Number of students receiving education.	Short, written survey of students and teachers to determine success of classroom education.
1D Classroom Education Bring educational program to two local schools annually.	Educating students on storm water and water quality practices will help promote better awareness.	Present a storm water quality education program to two local schools in the Morgan Hill area. Program to be one hour minimum.	Yr. 3: Bring educational program to two local schools.	Number of classrooms receiving education. Number of students receiving education.	Short, written survey of students and teachers to determine success of classroom education.

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1E Web Site Post stormwater related information on City website.	Local updated information will raise awareness of the stormwater program.	Post and maintain a link about the City's storm water management plan on the City's web page. The link shall be present at all times and updated quarterly. Provide a minimum of 5 articles on storm water pollution prevention and update every quarter.	Yr. 1: Develop and post stormwater information on City's website. Update quarterly or more often if necessary.	Updated presence of storm water plan throughout year. Number of storm water pollution prevention articles posted.	Was web site established? Track number of hits to storm water site.
1E Web Site Post stormwater related information on City website.	Local updated information will raise awareness of the stormwater program.	Post and maintain a link about the City's storm water management plan on the City's web page. The link shall be present at all times and updated quarterly. Provide a minimum of 5 articles on storm water pollution prevention and update every quarter.	Yr. 2: Maintain stormwater information on City's website. Update quarterly or more often if necessary.	Updated presence of storm water plan throughout year. Number of storm water pollution prevention articles posted.	Track number of hits to storm water site. Survey residents about where they get their information about the City's storm water quality program.
1E Web Site Post stormwater related information on City website.	Local updated information will raise awareness of the stormwater program.	Post and maintain a link about the City's storm water management plan on the City's web page. The link shall be present at all times and updated quarterly. Provide a minimum of 5 articles on storm water pollution prevention and update every quarter.	Yr. 3: Maintain stormwater information on City's website. Update quarterly or more often as necessary.	Updated presence of storm water plan throughout year. Number of storm water pollution prevention articles posted.	Track number of hits to storm water site. Survey residents about where they get their information about the City's storm water quality program.
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1F Teleworks Messages Utilize Teleworks system as a means to inform citizens about the City's stormwater program.	Information accessible via the web will raise awareness of the stormwater program.	Install and maintain a Teleworks message about the City's storm water plan. The message should be present at all times.	Yr. 1: Develop and record stormwater information on City's Teleworks system.	Teleworks message present, clear, and offers useful information.	Was Teleworks message system established?
1F Teleworks Messages Utilize Teleworks system as a means to inform citizens about the City's stormwater program.	Information accessible will raise awareness of the stormwater program.	Utilize Teleworks system as a means to inform citizens about the City's stormwater program.	Yr. 2: Record stormwater information on City's Teleworks system.	Teleworks message present, clear, and offers useful information.	Track number of calls with queries about storm water quality (if possible). Survey residents about where they get their information about the City's storm water quality program.
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1F Teleworks Messages Utilize Teleworks system as a means to inform citizens about the City's stormwater program.	Information accessible will raise awareness of the stormwater program.	Utilize Teleworks system as a means to inform citizens about the City's stormwater program.	Yr. 5: Record stormwater information on City's Teleworks system.	Teleworks message present, clear, and offers useful information.	Track number of calls with queries about storm water quality (if possible). Survey residents about where they get their information about the City's storm water quality program.
1G Used Oil Disposal Collect used oil biweekly as a component of our curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities are available for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Collect used oil biweekly and offer two local drop-off locations to eliminate residential waste oil dumping.	Collection of used oil every other week for Morgan Hill residents.	Yr. 1: Collect used oil biweekly and offer two local drop-off locations.	Number of times used oil is collected at curb side.	Track quantity of used oil pick-ups. Is number of pick-ups increasing? Decreasing?
1G Used Oil Disposal Collect used oil biweekly as a component of our curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities are available for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Collect used oil biweekly and offer two local drop-off locations to eliminate residential waste oil dumping.	Collect used oil biweekly as a component of our curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities are available for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Yr. 2: Collect used oil biweekly and offer two local drop-off locations.	Number of times used oil is collected at curb side.	Track quantity of used oil pick-ups. Is number of pick-ups increasing? Decreasing?

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1G Used Oil Disposal Collect used oil biweekly as a component of our curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities are available for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Collect used oil biweekly and offer two local drop-off locations to eliminate residential waste oil dumping.	Collect used oil biweekly as a component of our curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities are available for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Yr. 4: Collect used oil biweekly and offer two local drop-off locations.	Number of times used oil is collected at curb side.	Track quantity of used oil pick-ups. Is number of pick-ups increasing? Decreasing?
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TABLE 1 – PUBLIC EDUCATION AND OUTREACH

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
1H Household Hazardous Waste Collection Offer locations in the County multiple days per year for residents and small business to bring hazardous waste.	Dumping of hazardous waste will be eliminated by offering drop-off locations.	Offer household hazardous waste collection once per quarter (Four times per year).	Yr. 1: Offer locations to drop-off household hazardous waste multiple times per year.	Number of times household hazardous waste drop-off is made available.	Track number of participants. Track volume/quantity of material dropped off. What percentage of households utilize household hazardous waste collection service?
1H Household Hazardous Waste Collection Offer locations in the County multiple days per year for residents and small business to bring hazardous waste.	Dumping of hazardous waste will be eliminated by offering drop-off locations.	Offer household hazardous waste collection once per quarter (Four times per year).	Yr. 2: Offer locations to drop-off household hazardous waste multiple times per year.	Number of times household hazardous waste drop-off is made available.	Track number of participants. Track volume/quantity of material dropped off. What percentage of households utilize household hazardous waste collection service?
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Minimum Control Measure #2
PUBLIC INVOLVEMENT AND PARTICIPATION

Introduction

A Phase II storm water plan permittee shall encourage the public to be involved in the storm water program. The program must, at a minimum, comply with State and local public notification requirements. The public can provide valuable input and assistance to the storm water management program. Benefits include broader public support for the program and increased resources in the form of citizen volunteers. The City already has current, on-going programs that meet the requirements of this minimum control measure. The City will benefit from coordination of our program with the current program of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), which is performing a similar function in the south Bay Area.

A. Public Meetings

Public meetings to receive input on the Storm Water Management Plan will be held annually. Public meetings are an excellent way to inform citizens about storm water impacts in addition to gaining support for the proposed storm water management program. One public meeting will be held each year coordinated with the annual reporting cycle. The public meeting will be held in April or May after the rain season to solicit the public's input about aspects of the program that work well or don't work well. Meeting dates will be scheduled to allow enough time to meet reporting objectives. Public comments will be incorporated in annual reports. Proper public notification will be performed as required. The effectiveness of this program will be measured by the number of attendees at meetings. Surveys will be conducted at public events. The surveys will be used to learn how knowledgeable citizens are about storm water pollution and how much is known about the City's SWMP.

B. Storm Drain Stenciling

The City plans to develop an active program of stenciling storm drain inlets in highly visible areas advising the public that dumping is not allowed. The City currently has 2,200 storm drains and many of them are already painted. A stenciling schedule and area map of storm drains will be developed as part of the program to determine the percentage of storm drain inlets that are stenciled. Some storm drains have been painted by developers and others have been painted or refreshed from previous volunteer events. This program will be performed by volunteers and renewed every few years because of gradual loss of markings due to weathering. By stenciling storm water quality messages adjacent to storm drain inlets that are visible to the public, public awareness will be raised about the impacts of pollutants entering the storm drain system. It is a goal of the Plan to enlist boy-scout or girl-scout troops to map and count existing painted storm drain inlets. These organizations were selected because scouts seek challenging community projects.

The City will conduct a storm drain stenciling participation event in year 2 and year 4. The event will be coordinated through the City's Volunteer Coordinator. For each of the

designated years, the City will conduct a storm drain stenciling event that includes at least 2 local service organizations participating. This parameter will be measured by the number of participating volunteers.

C. Community Clean-up

Community clean-ups involve stream cleanup programs that coincide with national programs of the same nature. Participating volunteers are made aware of the importance of controlling litter to water courses. Morgan Hill participates in the annual Coastal Cleanup Day held the third Saturday in September. On Coastal Cleanup Day thousands of pounds of trash and recyclables are picked up by volunteers at creek sites around the valley which makes it a worthy effort.

The City participates in National River Cleanup Day held yearly in May each year. The City also holds a Community Cleanup Day which is generally held April of each year where volunteers clean up parks and sidewalks. During each of the five years, the City of Morgan Hill will conduct at least one community clean-up event and will participate in one other regional event such as the National River Cleanup Day. The City's participation in the regional event will vary from having City staff manning a clean-up station to providing materials (bags, gloves, etc.) to volunteers. This parameter will be measured by the number of participating volunteers.

D. Community Gardening/Composting

Soil, yard wastes, over watering, and garden chemicals become part of the urban runoff mix that winds its way through streets, gutters, and storm drains before entering the creeks and lakes. Fertilizers, pesticides, and herbicides are washed off lawns and landscaped areas. These chemicals not only kill garden invaders, they also harm useful insects, poison fish, and contaminate water. The City will utilize an existing County program that offers home composting classes each month at no charge to residents through the Home Composting Education Program hosted by the County of Santa Clara. A drawing for a free compost bin is held at each class. Classes are held on Wednesday evenings and Saturday mornings. During each of the five years, the City of Morgan Hill will participate in at least ten community gardening/composting workshops. This parameter will be measured by the number of workshop participants.

E. Public Hotline

To promote public input, the City will have a hotline for reporting illicit discharges. Public service announcements on the website and public access cable channels will be utilized to inform the public what illicit discharges are, the harm they can cause, and how to contact appropriate personnel.

During year one, the City will have established a public hotline. By the end of year two, the City will have trained phone reception staff about illicit discharge protocol. Staff will log what type of storm water pollution (illicit discharge or failed construction site runoff controls) the caller is concerned about. By the end of year three, the City will have advertised the hotline on its website, on public access cable channels once per month, in City Visions twice per

year (City of Morgan Hill newsletter that goes to all residents receiving a water bill), and the Morgan Hill Times newspaper twice per year. This parameter will be measured by how many advertisements are placed.

TABLE 2 – PUBLIC INVOLVEMENT AND PARTICIPATION

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
2A Public Meetings Hold one public meeting each year coordinated with the annual reporting cycle.	Public meetings offer the community an opportunity to hear about SWMP program and provide input.	Hold one public meeting each year coordinated with the annual reporting cycle.	Yr. 1: Hold a public meeting in April or May. Proper public noticing is required.	Meeting held. Proper notices filed.	Track number of attendees. Document input.
2A Public Meetings Hold one public meeting each year coordinated with the annual reporting cycle.	Public meetings offer the community an opportunity to hear about SWMP program and provide input.	Hold one public meeting each year coordinated with the annual reporting cycle.	Yr. 2: Hold a public meeting in April or May. Proper public noticing is required.	Meeting held. Proper notices filed.	Track number of attendees. Document input.
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2A Public Meetings Hold one public meeting each year coordinated with the annual reporting cycle.	Public meetings offer the community an opportunity to hear about SWMP program and provide input.	Hold one public meeting each year coordinated with the annual reporting cycle.	Yr. 5: Hold a public meeting in April or May. Proper public noticing is required.	Meeting held. Proper notices filed.	Track number of attendees. Document input.
2B Storm Drain Stenciling Conduct a storm drain stenciling participation event every other year. The event should include a minimum of two service organizations every other year.	Stenciling storm water quality messages adjacent to storm drain inlets that are visible to the public will raise awareness about the impacts of pollutants entering the storm drain system.	Conduct a storm drain stenciling participation event every other year. The event should include a minimum of two service organizations every other year. Update master map with all new stenciling locations with a layer for stenciling.	Yr. 2: Conduct a storm drain stenciling event which includes at least 2 service organizations participating. Update map to show new locations.	Storm drain stenciling event happens. Locations and participants documented.	Track number of storm drain inlets marked and compare to entire list of inlets. Track number and variety of service organization participants. Did two organizations participate?

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2C Community Clean-up Coordinate one community clean up day per year. Event is recommended to coincide with regional or national events of similar nature. Coordination with the Santa Clara Valley Water District is important.	Having the public participate in a clean-up day helps promote storm water quality and allows for citizens to take "ownership" of the creeks and waterbodies.	Hold one City sponsored community clean-up day per year. Enlist the participation of community groups and residents who want to help. Participate in one regional clean-up day per year.	Yr. 1: Hold one City sponsored community clean-up event. Participate in one regional clean-up event.	Community clean-up event happens annually.	Track number and variety of participants. Track volume of waste picked up.
2C Community Clean-up Coordinate one community clean up day per year. Event is recommended to coincide with regional or national events of similar nature. Coordination with the Santa Clara Valley Water District is important.	Having the public participate in a clean-up day helps promote storm water quality and allows for citizens to take "ownership" of the creeks and waterbodies.	Hold one City sponsored community clean-up day per year. Enlist the participation of community groups and residents who want to help. Participate in one regional clean-up day per year.	Yr. 2: Hold one City sponsored community clean-up event. Participate in one regional clean-up event.	Community clean-up event happens annually.	Track number and variety of participants. Track volume of waste picked up.
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TABLE 2 – PUBLIC INVOLVEMENT AND PARTICIPATION

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
2C Community Clean-up Coordinate one community clean up day per year. Event is recommended to coincide with regional or national events of similar nature. Coordination with the Santa Clara Valley Water District is important.	Having the public participate in a clean-up day helps promote storm water quality and allows for citizens to take "ownership" of the creeks and waterbodies.	Hold one City sponsored community clean-up day per year. Enlist the participation of community groups and residents who want to help. Participate in one regional clean-up day per year.	Yr. 5: Hold one City sponsored community clean-up event. Participate in one regional clean-up event.	Community clean-up event happens annually.	Track number and variety of participants. Track volume of waste picked up.
2D Community Gardening/Composting Offer community gardening/composting workshops at no charge to residents through the Home Composting Educational Program.	Fertilizers, pesticides, and herbicides harm useful insects, poison fish, and contaminate water. Offering alternative fertilizing techniques will help keep contaminants out of creeks.	Offer ten community gardening/composting workshops per year at no charge to residents through the Home Composting Educational Program.	Yr. 1: Offer ten community gardening/composting workshops.	Number of community gardening/composting workshops held.	Monitor number of participants. Follow-up surveys of participants to see how well gardening/composting is going.
2D Community Gardening/Composting Offer community gardening/composting workshops at no charge to residents through the Home Composting Educational Program.	Fertilizers, pesticides, and herbicides harm useful insects, poison fish, and contaminate water. Offering alternative fertilizing techniques will help keep contaminants out of creeks.	Offer ten community gardening/composting workshops per year at no charge to residents through the Home Composting Educational Program.	Yr. 2: Offer ten community gardening/composting workshops.	Number of community gardening/composting workshops held.	Monitor number of participants. Follow-up surveys of participants to see how well gardening/composting is going.
2D Community Gardening/Composting Offer community gardening/composting workshops at no charge to residents through the Home Composting Educational Program.	Fertilizers, pesticides, and herbicides harm useful insects, poison fish, and contaminate water. Offering alternative fertilizing techniques will help keep contaminants out of creeks.	Offer ten community gardening/composting workshops per year at no charge to residents through the Home Composting Educational Program.	Yr. 3: Offer ten community gardening/composting workshops.	Number of community gardening/composting workshops held.	Monitor number of participants. Follow-up surveys of participants to see how well gardening/composting is going.

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2D Community Gardening/Composting Offer community gardening/composting workshops at no charge to residents through the Home Composting Educational Program.	Fertilizers, pesticides, and herbicides harm useful insects, poison fish, and contaminate water. Offering alternative fertilizing techniques will help keep contaminants out of creeks.	Offer ten community gardening/composting workshops per year at no charge to residents through the Home Composting Educational Program.	Yr. 5: Participate in ten community gardening/composting workshops per year.	Number of community gardening/composting workshops held.	Monitor number of participants. Follow-up surveys of participants to see how well gardening/composting is going.
2E Public Hotline The City to have a hotline for the public to contact appropriate personnel if an illicit discharge is observed.	A public hotline allows citizens to report illicit discharge observations. Helps City staff police community.	Set up and maintain a City hotline for the community to report illicit discharges. Publicize phone number.	Yr. 1: City will establish hotline.	Hotline established.	Track number of calls. Track violations and enforcement actions.
2E Public Hotline The City to have a hotline for the public to contact appropriate personnel if an illicit discharge is observed.	A public hotline allows citizens to report illicit discharge observations. Helps City staff police community.	To promote public input, the City will have a hotline for the public to contact appropriate personnel if an illicit discharge is observed.	Yr. 2: Phone employees will be trained in illicit discharge protocol. Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Hotline is kept up-to-date and accessible 24 hours per day.	Track number of calls. Track violations and enforcement actions.
2E Public Hotline The City to have a hotline for the public to contact appropriate personnel if an illicit discharge is observed.	A public hotline allows citizens to report illicit discharge observations. Helps City staff police community.	To promote public input, the City will have a hotline for the public to contact appropriate personnel if an illicit discharge is observed.	Yr. 3: Advertise the hotline on City web site at all times, public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Hotline is kept up-to-date and accessible 24 hours per day.	Track number of calls. Track violations and enforcement actions.

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2E Public Hotline The City to have a hotline for the public to contact appropriate personnel if an illicit discharge is observed.	A public hotline allows citizens to report illicit discharge observations. Helps City staff police community.	To promote public input, the City will have a hotline for the public to contact appropriate personnel if an illicit discharge is observed.	Yr. 4: Advertise the hotline on City's web site at all times, public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Hotline is kept up-to-date and accessible 24 hours per day.	Track number of calls. Track violations and enforcement actions.
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Minimum Control Measure #3
ILLICIT DISCHARGE DETECTION AND ELIMINATION

Introduction

Illicit discharge is any discharge to a municipal separate storm sewer system that is not composed entirely of storm water. Examples of illicit discharges include raw sewage, car wash waste water, oil and vehicle fluids, laundry waste water, and household toxics. Illicit discharges enter the system through either direct connections (e.g. waste water piping either mistakenly or deliberately connected to the storm drain) or indirect connections (e.g., infiltration into the storm drain system from a cracked sewer line or spills that migrate into a storm drain inlet). Exceptions to illicit discharge are discharges from NPDES permitted industrial sources and discharges from fire-fighting activities. Illicit discharges are considered "illicit" because a municipal separate storm sewer system is not designed to accept, process, or discharge such non-storm water activities. Untreated discharges that contribute high levels of pollutants, including heavy metals, toxics, oil and grease, solvents, nutrients, viruses, and bacteria to receiving water bodies result from illicit discharge. Pollutant levels from these illicit discharges have been shown in EPA studies to be high enough to significantly degrade receiving water quality and threaten aquatic, wildlife, and human health.

The City's approach to the Illicit Discharge Minimum Control Measure will be to incorporate a combination of mapping and monitoring, regulatory controls, establishment of procedures for reporting, establishment of a public hotline, and training for City staff.

A. Storm Water Infrastructure Map

A comprehensive storm water infrastructure map will aid the City of Morgan Hill in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth investigation. The map will help coordinate management activities to remove illicit connections and track storm drain maintenance. Overall maintenance of the storm drain system performed by the City's in-house Operations & Maintenance crews will be assisted by the use of the storm water infrastructure map. The map will locate outfalls, names and locations of receiving waters, and, over time, will include locations where illicit discharges are either suspected or found. This will aid in monitoring problem areas and coordinating with other appropriate agencies for enforcement and clean up. During the first year, the City will develop the comprehensive storm water infrastructure map. During subsequent years, the storm water infrastructure map will be updated. This parameter will be measured by yearly update, inventory, and prioritization of sites for inspection.

B. Ordinance

The City will evaluate existing in-house regulatory controls that address illicit discharges, and implement new ordinances, when necessary to ensure a comprehensive program of oversight and enforcement. By developing new or additional ordinances the City can target the illegal discharge of illicit substances into the storm sewer system. A comprehensive ordinance must be in place that prohibits the discharge of pollutants into the storm drain system and establishes enforcement, notification, and remediation

requirements. A review of the City Municipal Code for existing ordinances will be performed, as well as updating existing development requirements to include more storm water measures.

During the first year of the program, staff will evaluate existing regulatory requirements and research ordinances that have been successfully implemented in other local agencies. By the end of year two, the City will have adopted appropriate ordinances to meet the stated objectives. This parameter will be measured by whether or not a comprehensive ordinance that establishes enforcement, notification, and remediation requirements was developed.

C. Procedures

Development of procedures and staff training on how to address illicit discharges will help ensure that illicit discharges will be discovered and enforcement is followed through consistently. Currently, the procedure for reporting an illicit discharge of an unknown substance is to contact the Santa Clara County Fire Department Hazardous Materials Unit. Once the nature and type of substance is determined, either the Fire Department or Phillips Transportation and Remediation (a contractor to the City) will clean it up, or if it is determined to be non-hazardous, the City Maintenance Division will clean it up. If the illicit discharge is in a Santa Clara Valley Water District right-of-way, then the District is contacted. The District has jurisdiction over many of the creeks and waterways and performs visual screening and water sampling of outfalls as special studies or while performing stream maintenance in the area, however, they do not do any routine monitoring. If the substance is determined to be hazardous waste, then the Santa Clara County Environmental Health unit investigates and handles clean-up.

Public Works Maintenance and Operations employees are trained to advise and investigate all dry weather flows when observed. Additionally, they are trained to document any actions they take. Any actions taken will also be documented in the annual report, including the number of outfalls screened, any complaints received and corrected, and the number of discharges and quantities of flow eliminated.

Training will be coordinated with the Building and Public Works Departments. When an illegal wastewater connection to the storm drain system is suspected, the property owner is notified, and a dye test or video of the connection is made. If an illegal connection is discovered, the property owner must remove or correct the matter immediately. The storm drain system is designed to drain rain only, so any flow observed at outfalls during dry weather signals a problem. The monitoring team's job is to investigate outfalls and determine if dry weather flows are from an uncontaminated source, such as groundwater, or from a pollutant source, such as an industrial discharge or sanitary sewer overflow. South County Regional Wastewater Authority (SCRWA) Inspection currently inspects industrial and business sanitary sewer connections and their services will be called upon, if needed, to include storm drain line connections. SCRWA will conduct their own in-house training.

All Public Works Maintenance and Operations employees will receive training on maintenance and cleaning activities to be performed during sewer overflows, what to do when an illicit discharge is discovered, and how to clean up an illicit discharge. The

Building Department will be responsible for eliminating illegal wastewater connections to the storm drain system and their code enforcement and building inspectors will receive training for this. Public Works inspectors will be responsible for illicit discharge within the public right-of-way and all Public Works Engineering employees will receive training. Written procedures will be developed for staff to follow in the event that illicit discharges are discovered. In-house training of all Public Works Maintenance and Operations employees, Public Works Engineering employees, and Building Department employees will occur twice per year for one half hour with the exception that the initial training in the first year shall be one hour in length. All applicable employees should be trained by the first year. This parameter will be measured by the percent of applicable employees trained in each of the various groups and later, the number of employees receiving a refresher course.

D. Public Hotline

To compliment enforcement effort, the City will have a hotline for reporting illicit discharges. Public service announcements on the website and public access cable channels will be utilized to inform the public what illicit discharges are, the harm they can cause, and how to contact appropriate personnel.

During year one, the City will have established an illicit discharge hotline. By the end of year two, the City will have trained phone employees about illicit discharge protocol. Phone reception staff will log what type of storm water pollution (illicit discharge or failed construction site runoff controls) the caller is concerned about. By the end of year three, the City will have advertised the hotline on public access cable channels once per month, in City Visions twice per year (City of Morgan Hill newsletter that goes to all residents receiving a water bill), and the Morgan Hill Times newspaper twice per year. This parameter will be measured by how many advertisements are placed. Effectiveness of this parameter will be measured by the number of illicit discharges and failed construction site runoff controls detected through the hotline.

E. Notification of Targeted Industries

In order to reach applicable commercial and industrial establishments that potentially discharge to waterways, the City will provide informational brochures addressing concerns. Outreach could include motor vehicle dealerships, repair shops, restaurants, and other commercial and industrial establishments that handle materials that should not be discharged into water ways. Informational brochures can be an educational tool provided during inspections or investigation into illicit discharge complaints. Staff shall, to the best of its ability, keep a tally of the total number of restaurants and auto repair shops in the City. This parameter will be measured by the percentage of the City's restaurants and auto repair shops that receive a brochure.

F. Used Oil Disposal

Used oil and filters are collected biweekly as a component of the City's curbside recycling program. The City receives monthly reports on the amount of materials recycled through this program. In addition, for those residents not served by the curbside program, there are two local drop-off locations and additional opportunities for used oil recycling through

the Countywide Household Hazardous Waste Management Program. One drop off location is at Speedee Oil Change and Tune Up at 890 Tennant Station. They accept both oil and filters Monday through Saturday from 8 a.m. to 6 p.m. and on Sunday from 9 a.m. to 4 p.m. Another drop off location is Kragen Auto Parts at 16060 Monterey Road. They only accept oil from 8 a.m. to 8 p.m. Monday through Saturday and from 8 a.m. to 7 p.m. on Sunday. One of the primary goals of the curbside recycling program is to eliminate residential waste oil dumping into storm drains. Information about the availability of this program is featured periodically in City communication outlets and is provided by the County Recycling Hotline and the County Household Hazardous Waste Hotline. This parameter will be measured by the number of gallons of oil collected by the City's curbside recycling program.

G. Household Hazardous Waste Collection

The City participates in the Countywide Household Hazardous Waste Program via a formal agreement. Residents and small businesses can bring their hazardous waste to one of the different locations in the County several days per month. The nearest location is San Martin Transfer and Recycling at 14070 Llagas Avenue. Drop-offs are by appointment only between 8:30 a.m. and 4:30 p.m. to prevent unauthorized drop-offs and to ensure safe collection by professional staff. Drop-off days published in 2004 for the San Martin Transfer Station are February 6, February 7, March 5, March 6, April 2, April 3, April 30, May 1, June 4, and June 5. Other locations are in San Jose, Sunnyvale, Santa Clara, Cupertino, and West Valley. Household Hazardous Waste disposal is run by the County of Santa Clara and NorCal Waste Systems. NorCal Waste Systems determines the hours, days, and location of operation of the transfer station. Information about the availability of this program is featured periodically in City communication outlets and is provided by the County Recycling Hotline and the County Household Hazardous Waste Hotline. Household Hazardous Waste Collection reduces the amount of hazardous waste disposed of illegally. This parameter will be measured by the amount of hazardous waste that is collected.

H. Non-Storm Water Discharges

Non-storm water discharges are discharges into the storm drain system and receiving water bodies that can occur at all times of the year. The types of pollutants that can be introduced as a result of non-storm water discharges include sediment, soaps, oils, chlorine, pesticides, fertilizers, and turbidity. The Central Coast Region of the Regional Water Quality Control Board has determined that non-storm water discharges are significant polluters and therefore, should be addressed in the SWMP.

Potable water, which includes street and sidewalk washing, parking lot fundraiser car washing, and individual residential car washing, can introduce the following pollution problems: elevated water temperature, sediment, trash, debris, organics, soaps, oils, metals, and rancid water.

Parking lot car wash fund raisers are very popular in Morgan Hill but the residual runoff moves unchecked into the City's streets and sometimes directly to the storm drain system. By the end of year 5, the City will require all of these types of car washes to obtain a permit that requires the containment of residual runoff. This BMP is addressed in Table 3, Illicit

Discharge, Section 3B Ordinance. For other potable water issues such as sidewalk washing and individual residential car washing, they will be addressed with a public education program to educate citizens on the pollution problems that can occur with these activities and to provide them with alternate methods of accomplishing the cleaning. The education will be in the form of flyers, messages on the City's web page, and messages on the City's public Channel 17. This BMP is located in Table 3, Illicit Discharge, Section 3H will occur during years 1-5

Water line flushing occurs when the City's water utility crews flush out pipelines and fire hydrants. This will be addressed in the Minimum Control Measure #6 of this document. A 'Water Utility Discharge Pollution Prevention Plan' will be developed for use by City forces to establish a program of proper water system discharges. This document will be implemented by year 3.

Dechlorinated swimming pool discharges can introduce bacteria and salinity/total dissolved solids problems. The City will address this with a public education program to educate citizens on the problems that are caused by improperly discharging a residential pool. In addition, information will be provided on how to properly discharge from a pool. The public education program will include flyers, messages on the City's web site, and messages on the City's public television station Channel 17. This BMP will occur years 1-5.

Landscape irrigation and lawn watering can cause fertilizers and pesticides to enter the City's streets. The City will address this through a public education program. Through flyers, messages on the City's web page and on the public Channel 17, the public will learn how not to over-water and over fertilize lawns and landscaping. Citizens will gain the added benefit of water conservation through these messages. This BMP will occur years 1-5.

Concrete washout into the City's streets or storm drains can affect the water pH and turbidity. Common practice in all South Bay Area projects is to wash out only the mixer's chute into a wheelbarrow or similar receptacle. This is most often a small amount of washout (2 gallons or less). Construction sites 1 acre or larger are subject to preparing a Storm Water Pollution Prevention Plan (SWPPP) that includes a proper washout area. The SWPPP's are enforced by the City. In addition, the City shall rely on existing ordinances in the Municipal Code. The first is Section 8.16.090, "Sweeping litter into gutters prohibited" and Section 8.16.140, "Litter in lakes and fountains".

Street grinding occurs when City maintenance crews perform certain types of maintenance activities and the resulting debris can cause turbidity problems in receiving water bodies. This will be addressed in MCM #6, Good Housekeeping by establishing procedures for street grinding that include blocking of filtering storm drain inlets and sweeping debris after grinding operation is complete.

TABLE 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
3A Stormwater Infrastructure Map City to have and maintain map of existing storm water facilities including outfalls to identified receiving waters.	A comprehensive storm water infrastructure map will aid the City in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth investigation. The map will help coordinate management activities to remove illicit connections and track storm drain system maintenance.	A storm water infrastructure map will be developed to show existing storm drain facilities, including pipes, culverts, inlets and outfalls. In addition, receiving waters shall be identified and located.	Yr. 1: A storm water infrastructure map will be developed to show existing storm drain facilities, including pipes, culverts, inlets and outfalls.	Storm water infrastructure map completed.	Map is clear, comprehensive, and accessible to staff, the public, and other agencies. Map enables staff to track illicit discharge reports and to plan other storm water permit activities.
3A Stormwater Infrastructure Map City to have and maintain map of existing storm water facilities including outfalls to identified receiving waters.	A comprehensive storm water infrastructure map will aid the City in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth investigation. The map will help coordinate management activities to remove illicit connections and track storm drain system maintenance.	The map will be continually updated in all subsequent years, to include new facilities and to prioritize sites for inspection.	Yr. 2: Update map.	Storm water infrastructure map is updated as new infrastructure is added.	Map is clear, comprehensive, and accessible to staff, the public, and other agencies. Map enables staff to track illicit discharge reports and to plan other storm water permit activities.
3A Stormwater Infrastructure Map City to have and maintain map of existing storm water facilities including outfalls to identified receiving waters.	A comprehensive storm water infrastructure map will aid the City in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth investigation. The map will help coordinate management activities to remove illicit connections and track storm drain system maintenance.	The map will be continually updated in all subsequent years, to include new facilities and to prioritize sites for inspection.	Yr. 3: Update map.	Storm water infrastructure map is updated as new infrastructure is added.	Map is clear, comprehensive, and accessible to staff, the public, and other agencies. Map enables staff to track illicit discharge reports and to plan other storm water permit activities.
3A Stormwater Infrastructure Map City to have and maintain map of existing storm water facilities including outfalls to identified receiving waters.	A comprehensive storm water infrastructure map will aid the City in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth investigation. The map will help coordinate management activities to remove illicit connections and track storm drain system maintenance.	The map will be continually updated in all subsequent years, to include new facilities and to prioritize sites for inspection.	Yr. 4: Update map.	Storm water infrastructure map is updated as new infrastructure is added.	Map is clear, comprehensive, and accessible to staff, the public, and other agencies. Map enables staff to track illicit discharge reports and to plan other storm water permit activities.

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3B Ordinance An ordinance addressing illicit discharge will establish regulatory control for the City.	City should have regulatory authority to find illicit discharges illegal and to enforce disciplinary actions.	Review City Municipal Code for existing ordinances addressing illicit discharges. Research ordinances that have been successfully implemented in other local agencies (minimum of three).	Yr. 1: Review and evaluate existing ordinances that address illicit discharges.	City has identified all in-house ordinances that address illicit discharge and has accumulated example ordinances from at least three other cities.	City has sufficient information to develop a comprehensive Illicit Discharge Ordinance.
3B Ordinance An ordinance addressing illicit discharge will establish regulatory control for the City.	City should have regulatory authority to find illicit discharges illegal and to enforce disciplinary actions.	Based on research in Year 1, establish necessary ordinance(s) for City Council adoption to properly address illicit discharges.	Yr. 2: City adopts ordinance(s) designed to target the illegal discharging of illicit substances into the storm sewer system.	Ordinance adopted.	City has sufficient regulatory control to find and punish illicit discharge violators. Number of enforcement actions is tracked.
3B Ordinance An ordinance addressing the non-storm water pollution source fund raiser car washes.	City should have regulatory authority to restrict runoff from parking lot car wash events.	Establish an ordinance that controls fund raiser car wash events. The objective of the ordinance should be to require permits for car washes and to require that runoff is captured and handled properly.	Yr. 5: City adopts ordinance regulating parking lot car washes.	Ordinance adopted.	City has sufficient regulatory control to limit runoff from parking lot car washes. Number of permits is tracked and compared to pre-ordinance years. Number of enforcement actions is tracked.
3C Procedures Written and adopted procedures for addressing illicit discharge is an important staff tool.	Having a set of written procedures for City staff to follow in the event that an illicit discharge is discovered will help ensure that enforcement is followed through consistently.	Establish a set of procedures for City staff to follow to address illicit discharge. Procedures to include step by step approach and applicable phone numbers. All Public Works employees and Building Department employees to get one hour of training.	Yr. 1: Written procedures established and adopted. All PW staff and Building Dept. staff trained in procedures (1 hour).	Procedures established and adopted. Training documented.	Procedures are in place to properly address illicit discharges. All PW and Bldg. staff are able to effectively respond to illicit discharge reports.

TABLE 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
3C Procedures Written and adopted procedures for addressing illicit discharge is an important staff tool.	Having a set of written procedures for City staff to follow in the event that an illicit discharge is discovered will help ensure that enforcement is followed through consistently.	Train applicable Public Works and Bldg. employees about illicit discharge (twice per year, 1/2 hour per session). Update procedures if necessary.	Yr. 2: All PW and Bldg. staff receive 1/2 hour of training two times on procedures.	All PW and Bldg. staff receive two sessions of training. Training is documented.	All PW and Bldg. staff understand how to respond to illicit discharge reports. Reports handled consistently.
3C Procedures Written and adopted procedures for addressing illicit discharge is an important staff tool.	Having a set of written procedures for City staff to follow in the event that an illicit discharge is discovered will help ensure that enforcement is followed through consistently.	Train applicable Public Works and Bldg. employees about illicit discharge (twice per year, 1/2 hour per session). Update procedures if necessary.	Yr. 3: All PW and Bldg. staff receive 1/2 hour of training two times on procedures.	All PW and Bldg. staff receive two sessions of training. Training is documented.	All PW and Bldg. staff understand how to respond to illicit discharge reports. Reports handled consistently.
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3D Public Hotline To promote public input, the City will have a hotline.	A public hotline will allow the public to report illicit discharges. The public's help will enable the City to better monitor illicit discharges.	Establish a public hotline for the public to utilize 24 hours per day. Train reception staff on how to retrieve hotline calls.	Yr. 1: City will establish hotline. Reception staff will be trained on hotline.	Hotline established. Persons retrieving hotline calls will be trained.	Track number of calls received and number of calls received that result in enforcement action. Track number of actual illicit discharges detected through hotline.
3D Public Hotline To promote public input, the City will have a hotline.	A public hotline will allow the public to report illicit discharges. The public's help will enable the City to better monitor illicit discharges.	Keep and maintain a public hotline for the public to utilize 24 hours per day.	Yr. 2: All City employees will receive instructions for illicit discharge protocol.	Hotline established. Persons retrieving hotline calls will be trained.	Track number of calls received and number of calls received that result in enforcement action. Track number of actual illicit discharges detected through hotline.

TABLE 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
3D Public Hotline To promote public input, the City will have a hotline.	A public hotline will allow the public to report illicit discharges. The public's help will enable the City to better monitor illicit discharges.	Keep and maintain a public hotline for the public to utilize 24 hours per day. Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Yr. 3: Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Advertisements posted.	Track number of calls received and number of calls received that result in enforcement action. Track number of actual illicit discharges detected through hotline.
3D Public Hotline To promote public input, the City will have a hotline.	A public hotline will allow the public to report illicit discharges. The public's help will enable the City to better monitor illicit discharges.	Keep and maintain a public hotline for the public to utilize 24 hours per day. Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Yr. 4: Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Advertisements posted.	Track number of calls received and number of calls received that result in enforcement action. Track number of actual illicit discharges detected through hotline.
3D Public Hotline To promote public input, the City will have a hotline.	A public hotline will allow the public to report illicit discharges. The public's help will enable the City to better monitor illicit discharges.	Keep and maintain a public hotline for the public to utilize 24 hours per day. Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Yr. 5: Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Advertisements posted.	Track number of calls received and number of calls received that result in enforcement action. Track number of actual illicit discharges detected through hotline.
3E Notification of Targeted Industries Outreach to applicable commercial and industrial establishments that potentially discharge to waterways.	Reaching out to applicable commercial and industrial establishments that can potentially discharge to waterways will raise awareness and reduce illicit discharges.	The City will provide informational brochures to motor vehicle dealerships, repair shops, restaurants, and other commercial and industrial establishments that handle materials that should not be discharged into water ways.	Yr. 1: City will distribute brochures.	Brochures distributed.	Track illicit discharge reports from commercial and industrial entities that have received brochures.
3E Notification of Targeted Industries Outreach to applicable commercial and industrial establishments that potentially discharge to waterways.	Reaching out to applicable commercial and industrial establishments that can potentially discharge to waterways will raise awareness and reduce illicit discharges.	The City will provide informational brochures to motor vehicle dealerships, repair shops, restaurants, and other commercial and industrial establishments that handle materials that should not be discharged into water ways.	Yr. 2: City will distribute brochures.	Brochures distributed.	Track illicit discharge reports from commercial and industrial entities that have received brochures.
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TABLE 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
3E Notification of Targeted Industries Outreach to applicable commercial and industrial establishments that potentially discharge to waterways.	Reaching out to applicable commercial and industrial establishments that can potentially discharge to waterways will raise awareness and reduce illicit discharges.	The City will provide informational brochures to motor vehicle dealerships, repair shops, restaurants, and other commercial and industrial establishments that handle materials that should not be discharged into water ways.	Yr. 4: City will distribute brochures.	Brochures distributed.	Track illicit discharge reports from commercial and industrial entities that have received brochures.
3E Notification of Targeted Industries Outreach to applicable commercial and industrial establishments that potentially discharge to waterways.	Reaching out to applicable commercial and industrial establishments that can potentially discharge to waterways will raise awareness and reduce illicit discharges.	The City will provide informational brochures to motor vehicle dealerships, repair shops, restaurants, and other commercial and industrial establishments that handle materials that should not be discharged into water ways.	Yr. 5: City will distribute brochures.	Brochures distributed.	Track illicit discharge reports from commercial and industrial entities that have received brochures.
3F Used Oil Disposal City-wide used oil collection program.	A program whereby citizens can dispose of used oil bi-weekly curbside and with two local drop-off locations will help eliminate residential waste oil dumping.	Collect used oil bi-weekly as a component of City curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Yr. 1: Collect used oil bi-weekly and offer two local drop-off locations.	Curbside program in place. Two drop-off locations established.	Track volume of used oil recycled. Track number of visits to drop-off locations. Are reported used oil illicit discharges increasing? Decreasing?
3F Used Oil Disposal City-wide used oil collection program.	A program whereby citizens can dispose of used oil bi-weekly curbside and with two local drop-off locations will help eliminate residential waste oil dumping.	Collect used oil bi-weekly as a component of City curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Yr. 2: Collect used oil bi-weekly and offer two local drop-off locations.	Curbside program in place. Two drop-off locations established.	Track volume of used oil recycled. Track number of visits to drop-off locations. Are reported used oil illicit discharges increasing? Decreasing?
3F Used Oil Disposal City-wide used oil collection program.	A program whereby citizens can dispose of used oil bi-weekly curbside and with two local drop-off locations will help eliminate residential waste oil dumping.	Collect used oil bi-weekly as a component of City curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Yr. 3: Collect used oil bi-weekly and offer two local drop-off locations.	Curbside program in place. Two drop-off locations established.	Track volume of used oil recycled. Track number of visits to drop-off locations. Are reported used oil illicit discharges increasing? Decreasing?

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Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
3F Used Oil Disposal City-wide used oil collection program.	A program whereby citizens can dispose of used oil bi-weekly curbside and with two local drop-off locations will help eliminate residential waste oil dumping.	Collect used oil bi-weekly as a component of City curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Yr. 4: Collect used oil bi-weekly and offer two local drop-off locations.	Curbside program in place. Two drop-off locations established.	Track volume of used oil recycled. Track number of visits to drop-off locations. Are reported used oil illicit discharges increasing? Decreasing?
3F Used Oil Disposal City-wide used oil collection program.	A program whereby citizens can dispose of used oil bi-weekly curbside and with two local drop-off locations will help eliminate residential waste oil dumping.	Collect used oil bi-weekly as a component of City curbside recycling program. For residents not served by the curbside program, two local drop-off locations and additional opportunities for used oil recycling through the Countywide Household Hazardous Waste Management Program.	Yr. 5: Collect used oil bi-weekly and offer two local drop-off locations.	Curbside program in place. Two drop-off locations established.	Track volume of used oil recycled. Track number of visits to drop-off locations. Are reported used oil illicit discharges increasing? Decreasing?
3G Household Hazardous Waste Collection	Dumping of hazardous waste will be reduced by offering drop-off locations at least once per month.	Offer location(s) in the County at least once per month for residents and small business to drop off household hazardous waste.	Yr. 1: Establish and offer a program for dropping off household hazardous waste.	Location(s) and dates to drop-off household hazardous waste established.	Track participation in household hazardous waste drop-off program.
3G Household Hazardous Waste Collection	Dumping of hazardous waste will be reduced by offering drop-off locations at least once per month.	Offer location(s) in the County at least once per month for residents and small business to drop off household hazardous waste.	Yr. 2: Continue to offer program for the drop-off of household hazardous waste.	Location(s) and dates to drop-off household hazardous waste established.	Track participation in household hazardous waste drop-off program.
3G Household Hazardous Waste Collection	Dumping of hazardous waste will be reduced by offering drop-off locations at least once per month.	Offer location(s) in the County at least once per month for residents and small business to drop off household hazardous waste.	Yr. 3: Continue to offer program for the drop-off of household hazardous waste.	Location(s) and dates to drop-off household hazardous waste established.	Track participation in household hazardous waste drop-off program.
3G Household Hazardous Waste Collection	Dumping of hazardous waste will be reduced by offering drop-off locations at least once per month.	Offer location(s) in the County at least once per month for residents and small business to drop off household hazardous waste.	Yr. 4: Continue to offer program for the drop-off of household hazardous waste.	Location(s) and dates to drop-off household hazardous waste established.	Track participation in household hazardous waste drop-off program.
3G Household Hazardous Waste Collection	Dumping of hazardous waste will be reduced by offering drop-off locations at least once per month.	Offer location(s) in the County at least once per month for residents and small business to drop off household hazardous waste.	Yr. 5: Continue to offer program for the drop-off of household hazardous waste.	Location(s) and dates to drop-off household hazardous waste established.	Track participation in household hazardous waste drop-off program.

TABLE 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
3H Public Education Educate public on non-storm water pollution prevention.	Educating the public on non-storm water pollution prevention will help control possible polluting activities that happen in residential neighborhoods.	Offer information to the public about the following activities. Washing sidewalks and driveways, washing cars at home, draining swimming pools and spas, and landscape irrigation. Flyers to be made available at public locations and community events. Information posted on City's web page. Information provided on public Channel 17.	Yrs. 1-5: Provide flyers at City Hall public counters. Flyers distributed at public events. Yrs. 1-5: Post information on City's web page and maintain at all times. Yrs. 1-5: Provide information on public television Channel 17 twice per year.	Flyers produced and made available. Information posted on web page and maintained at all times. Message placed on Channel 17 twice per year.	Track number of flyers distributed. Track number of hits to web page. Survey residents to test knowledge of non-storm water pollution.

Minimum Control Measure #4
CONSTRUCTION SITE RUNOFF CONTROL

Introduction

Construction sites, with their proportionally large areas of disturbed native soil, can contribute significant amounts of polluted storm runoff to the City's drainage system. Sediment is the primary pollutant with runoff rates at construction sites being 10 to 20 times greater than those of agricultural lands, and 1,000 to 2,000 times greater than those of forest lands. During a short period of time, construction sites can contribute more sediment to streams than can be deposited naturally during several decades. The resulting siltation, and the contribution of other pollutants from construction sites, can cause physical, chemical, and biological harm to out nation's waters.

A. Ordinance

The City's approach to meeting this Minimum Control Measure will be to establish clear regulatory mandates for containing sediment and silt migration from construction sites. The City will implement comprehensive plan check and inspection procedures to ensure enforcement. As of March 10, 2004, projects one acre and larger are required to obtain a Construction Activities Storm Water General Permit from the State Water Resources Control Board to comply with National Pollutant Discharge Elimination System (NPDES) permitting requirements. Construction activity disturbing less than one acre will also require a permit if it is part of a larger common plan of development or sale disturbing a total of one acre or greater, or is individually designated for permit coverage by the Regional Water Quality Control Board (RWQCB) based on a threat to water quality. Already, as part of the plan check process, an applicant must provide to the City a copy of the Notice of Intent and WDID # obtained from the Board. A revised condition of approval for development projects in the City has also been added to the Standard Conditions of Approval in the Public Works section storm drain system category that reads, "Since the developed portion of this site encompasses more than 1 acre, a Storm Water Pollution Prevention Plan (SWPPP) will be required as a provision of the State's General National Pollutant Discharge Elimination System Storm Water Permit for Construction Activities. The SCVWD requests a copy of the SWPPP for their information."

As specified in the current Municipal Code (Section 18.74.330), grading and drainage plans illustrating sedimentation and erosion-control measures and structures, and the direction of all site drainage are to be submitted as a part of architectural and site review. All applicants with projects 1 acre or larger are required to submit a storm water pollution prevention plan to the City, with a copy to the SCVWD. To assist developers, owners, and contractors, the City provides an in-house memo to assist applicants with the procedure. All projects that plan to develop between October 15th and May 1st must submit an erosion control plan that meets the minimum standards and specifications of the Loma Prieta Resource Conservation District, which are available at the City's Public Works Department.

By the end of year two, staff will have analyzed all existing in-house regulatory requirements and developed a comprehensive construction site run-off control ordinance for adoption by

the City Council. The new ordinance will be modeled after one adopted by the City of Monterey:

Section 31.5-15. Discharges in Violation of Industrial or Construction Activity NPDES Storm Water Discharge Permit

"Any person subject to an industrial or construction activity NPDES storm water discharge permit shall comply with all provisions of such permit. Proof of compliance with said permit may be required in a form acceptable to the Public Works Director prior to or as a condition of a subdivision map, site plan, building permit, or development or improvement plan; upon inspection of the facility; during any enforcement proceeding or action; or for any other reasonable cause."

This parameter will be measured by whether or not an ordinance was developed meeting all six of the minimum requirements of General Permit Section D.2.d. : 1. regulatory mechanism to require erosion and sediment controls, 2. construction site operators to implement appropriate erosion and sediment control BMPs, 3. control of construction wastes, 4. procedures for site plan review, 5. procedures for consideration of public information (see public hotline.), and 6. procedures for site inspection and enforcement of control measures. The City's current program already meets requirements 1, 2, 4, and 5 above.

B. Site Plan Review and Plan Check

The City shall develop and implement a site plan review and plan check process that ensures approved plans contain all applicable measures conforming to adopted ordinances. The Standard Conditions of Approval in the Public Works section storm drain system category have been revised to require a SWPPP as a provision of the State's General NPDES Storm Water Permit for Construction Activities. As specified in the current Municipal Code, grading and drainage plans illustrating sedimentation and erosion-control measures and structures, and the direction of all site drainage are also to be submitted as a part of architectural and site review. All projects that plan to develop between October 15th and May 1st must submit an erosion control plan that meets the minimum standards and specifications of the Loma Prieta Resource Control District.

By the end of year two, plan review staff will be trained on SWPPP submittals and compliance with State requirements. By the end of year five, plan review staff will put together a guide for developers on how to put together a SWPPP. This guide may likely be incorporated into the Public Works Design Standards and Standard Details for Construction. This parameter will be measured by how many and what percentage of SWPPPs are received and reviewed by City plan review staff, and what percentage of reviewed SWPPPs are in full compliance with State and local regulations.

C. Site Inspection and Enforcement

Currently inspectors are instructed to halt all inspection activities if a project is not maintaining approved best management practices. This prevents progress at the job site until compliance. To strengthen overall inspection and enforcement, the City will develop and implement procedures for inspector to follow. Those procedures will include: checklists,

reports and daily logs, and notification. All procedures shall be in compliance with applicable ordinances.

To ensure proper site inspection at all affected projects, the City has already developed and implemented the procedure that projects that do not maintain BMPs are put on hold and denied any additional inspections until the BMPs are corrected. If a project is in violation, then a correction notice is issued. The City inspects 100 percent of permitted construction sites. Inspections occur until projects are finished and permits are finaled.

This parameter will be measured by tracking the total number of sites (greater than one acre), the percentage of those sites that are inspected each year, and the number of those sites found to be in compliance.

D. Public Hotline

To compliment enforcement effort, the City will have a hotline for reporting failed construction site runoff controls and non-storm water discharges from construction sites. For the public's convenience, this hotline will be the same hotline as used for reporting illicit discharges. Public service announcements on the radio and public access cable channels will be utilized to inform the public what failed construction site runoff controls are, the harm they can cause, and how to contact appropriate personnel.

During year one, the City will have established a hotline. By the end of year two, the City will have trained phone employees about protocol. Phone employees will log what type of storm water pollution the caller is reporting. By the end of year three, the City will have advertised the hotline on public access cable channels once per month, in City Visions twice per year (City of Morgan Hill newsletter that goes to all residents receiving a water bill), and the Morgan Hill Times newspaper twice per year. This parameter will be measured by how many advertisements are placed.

TABLE 4 – CONSTRUCTION SITE RUNOFF CONTROL

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
4A Ordinance Ordinance establishing regulatory control of construction site run-off.	Sedimentation and siltation from construction sites can cause physical, chemical, and biological harm to local waterways if not contained properly. The City requires regulatory enforcement powers to help control these pollutants.	Evaluate existing ordinance for erosion and sediment control at construction sites. Create and have City Council adopt ordinance addressing construction site run-off and ensuring compliance with NPDES permit.	Yr. 2: City Council adoption of ordinance for erosion and sediment control for all developers of construction sites greater than one acre.	Ordinance established and adopted.	City staff has sufficient enforcement authority to quickly address construction site run-off issues.
4B Site Plan Review and Plan Check Address construction run-off before construction begins.	Requiring construction site run-off prevention measures on plans helps reduce problems early on and reduces costly field enforcement.	Establish construction plan site run-off prevention requirements. Incorporate requirements in City Design Standards. Train City plan checkers.	Yr. 2: Establish construction run-off plan requirements. Incorporate into Design Standards. Train plan checkers.	Requirements established. Requirements incorporated into Design Standards. Plan Checkers trained.	Track number of approved plans that have new standards incorporated after program is established. Are all plans getting checked?
4B Site Plan Review and Plan Check Address construction run-off before construction begins.	Requiring construction site run-off prevention measures on plans helps reduce problems early on and reduces costly field enforcement.	Train Public Works plan check staff on proper SWPPP submittals.	Yr. 2: All Public Works plan check staff to receive training on the contents of a SWPPP and the proper submittals of a SWPPP.	Training provided and documented.	Plan check review of SWPPP's is consistent. All development in City has proper SWPPP.
4B Site Plan Review and Plan Check Address construction run-off before construction begins.	Requiring construction site run-off prevention measures on plans helps reduce problems early on and reduces costly field enforcement.	Create and provide detailed guide for developers on submittal of SWPPPs.	Yr. 5: Put together a detailed guide for developers on submittal of SWPPPs.	Guide completed and available for distribution. Track percentage of SWPPP's received that are in full compliance.	Developers have a guide to help put together City-approved SWPPP's. City sees SWPPP's that are consistent and complete.
4C Site Inspection and Enforcement Ensure site inspection at all construction sites.	Proper and consistent inspection of SWPPP measures will help prevent construction site run-off for sites larger than 1 acre.	Train City inspectors about SWPPP's and other run-off prevention measures. Provide written procedures, including checklists, reports, daily logs, and notification.	Yr. 1: Train all City inspectors on the field requirements of SWPPP's and other required run-off prevention measures. Provide written procedures for inspectors to utilize.	City inspectors trained. Procedures completed and provided to inspectors.	All construction sites receive same scrutiny for preventing construction site run-off. Track number of violation notices.
4C Site Inspection and Enforcement Ensure site inspection at all construction sites.	Proper and consistent inspection of SWPPP measures will help prevent construction site run-off for sites larger than 1 acre.	In years 1-5 all construction sites to monitored for proper erosion control.	Yr. 1-5: 100% of construction sites monitored for erosion control. Sites shall comply with regulatory requirements.	Track total number of sites. Track percentage of sites. Track percentage that are in compliance.	All construction sites are monitored for erosion control and SWPPP requirements. Track number of violation notices.

TABLE 4 – CONSTRUCTION SITE RUNOFF CONTROL

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
4D Public Hotline Allow public to report on construction site run-off violations.	A hotline promotes public input and assists City with enforcement of construction site run-off.	City to establish hotline for the public to contact appropriate personnel if construction site runoff controls are not properly used.	Yr. 1: City will establish hotline.	Hotline established.	Track number of calls from public reporting construction site run-off violations.
4D Public Hotline Allow public to report on construction site run-off violations.	A hotline promotes public input and assists City with enforcement of construction site run-off.	City to maintain hotline for the public. Provide training to Public Works phone reception employees on how to handle hotline call regarding construction site runoff.	Yr. 2: Maintain hotline. Train all PW phone reception staff on how to retrieve calls and implement investigation.	Hotline operational. PW phone reception staff trained.	Calls received get processed for investigation. Track number of calls from public reporting construction site run-off violations.
4D Public Hotline Allow public to report on construction site run-off violations.	A hotline promotes public input and assists City with enforcement of construction site run-off.	City to establish hotline for the public to contact appropriate personnel if construction site runoff controls are not properly used.	Yr. 3: Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Hotline operational. Advertisements posted.	Track number of calls from public reporting construction site run-off violations.
4D Public Hotline Allow public to report on construction site run-off violations.	A hotline promotes public input and assists City with enforcement of construction site run-off.	City to establish hotline for the public to contact appropriate personnel if construction site runoff controls are not properly used.	Yr. 4: Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Hotline operational. Advertisements posted.	Track number of calls from public reporting construction site run-off violations.
4D Public Hotline Allow public to report on construction site run-off violations.	A hotline promotes public input and assists City with enforcement of construction site run-off.	City to establish hotline for the public to contact appropriate personnel if construction site runoff controls are not properly used.	Yr. 5: Advertise the hotline on public access cable channels once per month, City Visions twice per year, and the Morgan Hill Times newspaper twice per year.	Hotline operational. Advertisements posted.	Track number of calls from public reporting construction site run-off violations.

Minimum Control Measure #5
POST-CONSTRUCTION RUNOFF CONTROL

Introduction

As specified in the current Municipal Code (Section 18.74.330) "Grading and drainage plans illustrating existing topography, proposed cuts and fills, sedimentation and erosion-control measures and structures, the direction of all site drainage, and all structural drainage facilities, shall be submitted as a part of architectural and site review. On-site storm water retention ponds shall be required where permanent storm-drainage facilities are not available. All storm water retention ponds shall be landscaped and fenced, where required by the City Engineer. Permanent storm water drainage facilities shall be used to transmit storm water whenever possible."

Post-construction storm water management in areas undergoing new development or redevelopment is necessary because runoff from these areas has been shown to significantly affect receiving water bodies. Prior planning and design for the minimization of pollutants in post-construction storm water discharges can be a cost-effective approach to storm water quality management.

There are generally two forms of substantial impacts of post-construction runoff. The first is caused by an increase in the type and quality of pollutants in storm water runoff. As runoff flows over areas altered by development, it picks up harmful sediment and chemicals such as oil and grease, pesticides, heavy metals, and nutrients (e.g. nitrogen and phosphorus). These pollutants often become suspended in runoff and are carried to receiving waters, such as lakes, reservoirs, ponds and streams. Once deposited, these pollutants can enter the food chain through small aquatic life, eventually entering the tissues of fish and humans.

The second kind of post-construction runoff impact occurs by increasing the quantity of water delivered to the water body during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, water is collected from surfaces such as asphalt and concrete and routed to drainage systems where large volumes of runoff quickly flow to the nearest receiving water. The effects of this process include stream bank scouring and downstream flooding, which often lead to a loss of aquatic life and damage to property.

A. Best Management Practices

The City of Morgan Hill will address post-construction runoff by continuing existing policies that already reduce runoff and by working with the development community in a partnership to further reduce infiltration of pollutants. The City already has a development policy that is unique to cities in northern California. This policy significantly minimizes post-construction runoff because all new development must incorporate on-site detention basin capacity to capture runoff from the development itself. In other words, a portion of newly developed property must be set aside for capturing storm water runoff. These on-site basins are designed to allow for percolation/filtration of storm water runoff, while at the same time

controlling the rate of flow into the downstream drainage systems. An example of this policy is a 4 acre on-site detention basin constructed by the developer Warmington Homes. This area-wide basin has a capacity for 12.47 cubic feet per second for a 10 year allowable peak runoff to be accommodated from two sites including Central Park housing development (Central Park Development, LLC) and Morgan Lane development (Warmington Homes). Runoff to the Llagas Creek watershed is minimized by the use of the detention pond.

To further reduce and/or filter runoff from development and redevelopment, the City plans to work in a cooperative manner with developers. One widely accepted guideline manual is the "Start at the Source" Design Guidance Manual for Storm Water Quality Protection printed by the Bay Area Storm Water Management Agencies Association (BASMAA). This manual offers practical and aesthetic design alternatives aimed at reducing runoff. By the end of the second year, staff will have developed a brochure from the "Start at the Source" Design Guidance manual and other reference sources. The planned brochure provides developers with the City's recommended Best Management Practices (BMPs). Storm Water quality protection design features for new and redevelopment include source controls, design measures, and treatment controls to minimize the discharge of pollutants to storm drain systems and creeks. An example of a treatment control BMP is the use of a vegetative swale to treat runoff from a parking lot. A design measure BMP would be pervious pavement in a parking lot such that runoff and filter pollutants are reduced.

The City-produced brochures described above will be available at the Building Department permit counter, at the Public Works counter, and by mail upon request. By the end of year 2 all new development and redevelopment project applications will receive the brochure of the City's recommended Best Management Practices (BMPs). Once the City has adopted the ordinance governing General Permit Attachment 4 requirements (by Yr. 4), all General Permit Attachment 4 type projects, including single family residences, 100,000 square foot commercial developments, automotive repair shops, retail gasoline outlets, restaurants, home subdivisions with 10 or more housing units, and parking lots 5,000 square feet or more or with 25 or more parking spaces and are potentially exposed to storm water runoff, will be conditioned through the normal development process to comply with the ordinance. After Yr. 4, the brochure will be revised to include all required design standards.

Incentives for storm water quality improvement could also be offered through the recently voter-approved competitive Measure C development process (formerly Measure P). The Measure C development process applies to residential development and is the regulatory mechanism that the City of Morgan Hill uses to control growth. Many developers compete for the ability to build a limited number of housing units allowed per year. Development proposals are scored on the public merits of the design features built into the project. For instance, storm water is already part of the public facilities category that is scored and weighted into the overall palatability of the project. Points are awarded for developments that have a drainage concept that is consistent with the City's storm drain system. Points are also awarded for development in which storm drainage is accommodated with an on-site detention facility that is located and sized so as to serve or coordinate with future area-wide or adjacent development. Applicants that provide an oversized pond must supply information specifying how the pond sizing will address the area need and how other projects will be connected to the detention pond. The City will require approval by the City's Planning Commission to

accomplish these additional incentives in the Measure C development process for storm water quality improvement.

Several of the design standards recommended in General Permit Attachment 4 are currently in use as described below.

General Permit Attachment 4, B.2.a Peak Storm Water Runoff Discharge Rates - Protections through review are already in place to mitigate for increased potential for downstream erosion. Approval from the City Engineer must be obtained prior to connection to Butterfield Channel, the City's only waterway. Prior to connecting to other creeks and channels in Morgan Hill, the developer must obtain written approval from the SCVWD to drain to the waterway.

General Permit Attachment 4, B.2.b Conserve Natural Areas - Conservation is considered in the "Natural and Environmental Feature" section of the Measure C process. Projects must obtain a minimum of 7 points that illustrate that the project will conserve natural areas. Projects can obtain 1 point for restricting the amount of runoff caused by impervious surfaces and the covering of land area suitable for percolation where applicable. A project is also evaluated on whether it "considers, preserves or improves natural conditions on or adjacent to the site such as wildlife habitats, streams, creeks (Llagas, Little Llagas, Fisher, and Coyote Creeks) when appropriate and preserves riparian habitats in a natural state. If a project has such a riparian habitat and does not preserve it, the project loses a point. If the project has no such site, then it obtains no points. If the project has such a riparian habitat and preserves and improves the natural conditions, the project can obtain up to twp points. Up to two points may also be obtained if a project uses various site development practices to protect existing open space, hillsides, and agricultural land with maximum points awarded for the protection of areas external to the project.

General Permit Attachment 4, B.2.d Protect Slopes and Channels – This requirement is already in place because creek banks are in SCVWD's jurisdiction. SCVWD reviews development plans for projects in the area of the creek so that proposed development will not impact water quality. As stated in the City's Design Standards and Standard Details for Construction, all rip-rap structures, cut off walls, out fall structures, inlet structures, etc., shall be constructed in accordance with all applicable standards of the SCVWD." Proposed drainage to Butterfield Channel which is in the jurisdiction of the City is also subject to review by the City's Land Development staff.

General Permit Attachment 4, B.2.f Properly Design Outdoor Material Storage Areas – This requirement is addressed in Municipal Code Section 18.48.070 Liquid or solid wastes which reads:

> "Discharge of Waste Materials into Ground. No discharge at any point into any public sewer, private sewage disposal system, or stream, or into the ground, of any materials of such nature or temperature as can contaminate any water supply, interfere with bacterial processes in sewage treatment, or otherwise cause the emission of dangerous or offensive elements, shall be permitted, except in accord with standards approved by the California Department of Public Health or the Central Coast Water Quality Control Board."

General Permit Attachment 4, B.2.g Properly Design Trash Storage Areas – This requirement is addressed in Municipal Code Section 18.74.505, Trash containers and the Architectural Review Handbook. Per the Architectural Review Handbook, trash enclosures should be constructed of solid masonry material, a minimum 6' in height with solid view obstructing gates.

Any of the design standards applicable to all categories that are not already addressed in the Municipal Code, City Design Standards, Architectural Review Handbook, or Measure C will be addressed by Yr. 4. Any provisions applicable to individual priority project categories that are not already in place, will be developed by year 5. A minimum of one individual priority project category will be addressed each year. This parameter will be measured by whether or not the City meets the above deadlines for required post-construction design standards, and whether or not the City addresses at least one individual priority project category each year.

As stated above, by the end of Yr. 4, the City will develop a post-construction storm water brochure that contains all the required design standards. The brochure will reference applicable municipal codes, measures, or other sources of the requirements. This parameter will be measured by whether or not a post-construction storm water brochure is created and the number and percent of new development and redevelopment projects receiving the brochure.

B. Ordinance

By the end of the City's general permit term, the City should implement a more rigid policy through an ordinance for including storm water quality protection design features for new development and redevelopment. This would manifest itself in a storm water quality ordinance or some other written policy for conditioning developers to utilize more strict measures, including filtering systems. Storm water quality protection design features for new development and redevelopment include source controls, design measures, and treatment controls to minimize the discharge of pollutants to storm drain systems and creeks.

Before the end of Yr. 4, the City will adopt an ordinance to ensure implementation of all required design standards presented in General Permit Attachment 4. Some of the required design standards have already been adopted through the Municipal Code, City Design Standards, Architectural Review Handbook, or Measure C. All development and redevelopment projects that fall into one of the following categories are subject to Design Standards.

- Single-family Hillside Residences
- 100,000 Square Foot Commercial Developments
- Automotive Repair Shops
- Retail Gasoline Outlets
- Restaurants
- Home Subdivisions with 10 to 99 Housing Units
- Home Subdivisions with 100 or More Housing Units

- Parking Lots 50,000 square feet or more with 25 or more parking spaces and potentially exposed to storm water runoff.

As required by the City's NPDES Phase II Permit, the City reviews and updates local design standards to reduce potential negative impacts to storm water quality.

City will implement an ordinance or written policy prior to the expiration of the permit which would develop a more rigid policy of conditioning developers to participate in post-construction pollution prevention measures. Research and development of recommended measures for structural and non-structural best management practices will be performed during the first year. Development of a list of strategies and measures for effective post-runoff control tailored to meet the needs of the City will occur during the second year. Review to ensure that ordinances, design standards, and measure are met will be performed by the applicable Land Development Review staff in Building, Planning, and Public Works. Plans must show that the design standards required prior to issuance of Building Permit. If the design standards shown on the plans are not implemented on site, the final approval of the building permit will be held until a correction is made. This parameter will be measured by whether or not an ordinance was developed.

An amendment to an existing ordinance will also be implemented to ensure that no grading or building occurs within 30' of a perennial or intermittent stream to comply with the Basin Plan Setback Criteria. The City's existing Municipal Code Title 18, Zoning allows no building to occur within 50' of a perennial or intermittent stream. However, to fully comply with the Basin Plan Setback Criteria, no grading activity shall be allowed within 30' of a perennial or intermittent stream. This BMP will be implemented in Year 4.

C. Maintenance

Adequate long-term operation and maintenance of pollution prevention controls are necessary for the success of post-construction runoff controls. Maintenance of post-construction runoff controls are currently required to be performed by the commercial and industrial developers, or by the Home Owner's Association in the case of residential development. Building Department inspection will monitor the controls on private property to ensure they are adequately functioning and kept in working order. Public Works Inspection will monitor controls in the public right-of-way. This parameter will be measured by the number and percent of post-construction storm water controls inspected by the City Building and Public Works departments.

TABLE 5 – POST CONSTRUCTION SITE RUNOFF CONTROL

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
5A Post Construction Best Management Practices Development requirements that help reduce infiltration of pollutants into receiving waters.	The use of Best Management Practices for post construction will help ensure long term reduction of pollutants into receiving waters.	Undertake the necessary research to compile a list of structural and non-structural BMP's for post-construction that best fit the City's goal of eliminating pollutants from receiving water bodies.	Yr. 1: Research and develop recommended measures for structural and non-structural BMP's. Comply with one individual priority project category.	Sufficient research compiled to prepare draft of BMP Manual for post-construction.	City has compiled a list of BMP's that either have been successfully used in other communities and/or recommended by the RWQCB. Did City comply with one individual priority project category?
5A Post Construction Best Management Practices Development requirements that help reduce infiltration of pollutants into receiving waters.	The use of Best Management Practices for post construction will help ensure long term reduction of pollutants into receiving waters.	Complete manual of BMP's and distribute to development and building community.	Yr. 2: Prepare and adopt final draft of BMP manual for post-construction. Distribute manual to development and building community. Yrs 2-5: Comply with one additional priority project category per year.	BMP Manual completed and distributed to development and building community.	Were manuals delivered to known developers and builders? Did City comply with one additional priority project category?
5A Post Construction Best Management Practices Development and produce brochure for use by developers.	A brochure containing recommended BMP's for post construction will help local developers, builders, and contractors better understand the program and help implement effective measures.	Develop and produce a brochure of recommended BMP's for post construction. Once General Permit Attachment 4 ordinance is adopted by City, brochure shall be modified to include design requirements.	Yr. 2: Develop brochure of recommended BMP's for post construction. Provide to development community. Yr. 4: Revise brochure to include General Permit Attachment 4 design requirements.	Brochure developed and distributed to development community. Track percentage of development and redevelopment projects receiving brochure.	Developers, builders, and contractors submit plans that incorporate recommended BMP's. Track number of development plans that incorporate recommended BMP's and design requirements.
5A Post Construction Best Management Practices Amend the City's Measure C process to offer incentives to developers for incorporating post-construction measures.	By amending the Measure C process, developers have financial incentives to provide approved post construction measures in residential development.	Amend City Measure C process. The Measure C development process is the City's regulatory mechanism for controlling residential growth. Developers compete for the ability to build a limited number of housing units. City Planning Commission approval is required to amend the Measure C process to include post construction incentives.	Yr. 3: Staff to present proposal to Planning Commission to amend Measure C process. Yr. 3: Planning Commission approves amendment.	Measure C is amended.	Due to Measure C incentives, residential development proposals incorporate post construction BMP's.

TABLE 5 – POST CONSTRUCTION SITE RUNOFF CONTROL

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
5B Ordinance By Yr. 4, all development and redevelopment projects that fall into one of the following categories must meet the provisions of Attachment 4: **• Single-family Hillside Residences** **• 100,000 Square Foot Commercial Developments** **• Automotive Repair Shops** **• Retail Gasoline Outlets** **• Restaurants** **• Home Subdivisions with 10 to 99 Housing Units** **• Home Subdivisions with 100 or More Housing Units** **• Parking Lots 50,000 square feet or more with 25 or more parking spaces and potentially exposed to stormwater runoff.**	Due to the impervious nature of development and redevelopment projects there is great potential for pollutant runoff into receiving water bodies. The provisions of a comprehensive ordinance governing post-construction measures will help reduce run-off pollutants to receiving water bodies.	By Yr. 2, a list of post-construction measures that meet the requirements of General Permit Attachment 4 as well as making sense for the City of Morgan Hill will be compiled. This list will be compared to existing land development and redevelopment regulations. A final proposed list of measures will be compiled.	Yr. 2: Compile a comprehensive list of General Permit Attachment 4 design measures and compare to existing local requirements. Identify types of development affected.	List of design standards prepared for future development and redevelopment projects. List must be comprehensive and must meet GP Attachment 4 requirements. List of comparable existing design standards prepared. A final proposed list prepared.	Staff has sufficient information to draft an Attachment 4 program.
5B Ordinance By Yr. 4, all development and redevelopment projects that fall into one of the following categories must meet the provisions of Attachment 4: **• Single-family Hillside Residences** **• 100,000 Square Foot Commercial Developments** **• Automotive Repair Shops** **• Retail Gasoline Outlets** **• Restaurants** **• Home Subdivisions with 10 to 99 Housing Units** **• Home Subdivisions with 100 or More Housing Units** **• Parking Lots 50,000 square feet or more with 25 or more parking spaces and potentially exposed to stormwater runoff.**	Due to the impervious nature of development and redevelopment projects there is great potential for pollutant runoff into receiving water bodies. The provisions of a comprehensive ordinance governing post-construction measures will help reduce run-off pollutants to receiving water bodies.	By Yr. 3, two public meetings will be held with the development and building community to discuss proposed Attachment 4 measures for post-construction. The development and building community will learn about the NPDES Phase II permitting process. Also in Yr. 2, City Council will receive a workshop on the proposed Attachment 4 measures for post-construction.	Yr. 3: Hold two public meetings for the development and building community to present the proposed General Permit Attachment 4 post-construction measures. After the public meetings hold a workshop for the City Council on the proposed measures.	Two public meetings held for development and building community. Workshop held for City Council.	General Permit Attachment 4 post construction measures established. Development and Building Community understand the need and buy in to the program. City Council understands the need for the Attachment 4 program and directs City staff to prepare ordinance.

TABLE 5 – POST CONSTRUCTION SITE RUNOFF CONTROL

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
5B Ordinance By Yr. 4, all development and redevelopment projects that fall into one of the following categories must meet the provisions of Attachment 4: **• Single-family Hillside Residences** **• 100,000 Square Foot Commercial Developments** **• Automotive Repair Shops** **• Retail Gasoline Outlets** **• Restaurants** **• Home Subdivisions with 10 to 99 Housing Units** **• Home Subdivisions with 100 or More Housing Units** **• Parking Lots 50,000 square feet or more with 25 or more parking spaces and potentially exposed to stormwater runoff.**	Due to the impervious nature of development and redevelopment projects there is great potential for pollutant runoff into receiving water bodies. The provisions of a comprehensive ordinance governing post-construction measures will help reduce run-off pollutants to receiving water bodies.	By Yr. 4, an ordinance addressing the General Permit Attachment 4 program is prepared and adopted by City Council.	Yr. 4: Prepare ordinance. City Council adopt ordinance.	Ordinance prepared. Ordinance adopted by City Council.	Development and redevelopment projects now incorporate General Permit Attachment 4 post-construction measures.
5B Ordinance **Amend Municipal Code to conform with Basin Plan Setback Criteria.**	Amending the Municipal Code to comply with Basin Setback Criteria will prevent grading and building within 50' of streams.	Amend City Municipal Code, Title 18, Zoning, to prevent grading and building within 30' of a perennial or intermittent stream.	Yr. 4: Prepare amendment to Municipal Code, Title 18. Council adopts amendment.	Amendment adopted.	Building and grading no longer permitted within 30' of perennial or intermittent streams. City's municipal code now complies with Basin Plan setback criteria.
5C Maintenance	Post Construction Storm Water Controls must be inspected and enforced by the City.	By Yr. 4, all development projects with post construction storm water controls that were adopted in Yr. 3 .shall be inspected by the City Building and Public Works Departments.	Yr. 4: Construction inspection by City Building and Public Works inspectors shall include inspection of post-construction measures per the approved plans and specifications.	Inspection logs include inspections of post-construction measures.	Development and redevelopment projects now have fully completed post-construction measures prior to occupancy.

Minimum Control Measure #6
POLLUTION PREVENTION/GOOD HOUSEKEEPING

Introduction

The Pollution Prevention/Good Housekeeping minimum control measure requires the City to examine and subsequently alter the actions of its own forces to help ensure a reduction in the amount and type of pollution that: (1) collects on streets, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems.

While this measure is meant primarily to improve or protect receiving water quality by altering municipal or facility operations, it also can result in a cost savings for the City, since proper and timely maintenance of storm sewer systems can help avoid repair costs from damage caused by age and neglect.

A. Operations and Maintenance Program

The City of Morgan Hill has an Operations force of approximately 40 full-time employees responsible for the maintenance of streets, sewer, storm drains, and parks. This group operates out of a 2-acre corporation yard.

The operations and maintenance program is a comprehensive approach to address the multiple facets of the City's operation and maintenance work forces. Best Management Practices will be implemented to cover street sweeping schedules, a Storm Water Pollution Prevention Plan for the corporation yard, cleaning of storm drain facilities, training, and street cleaning. This program will lead to the reduction and elimination (where possible) of direct pollutant introduction into the storm sewer system.

During years 1-5, street sweeping schedules will be reviewed throughout the City to confirm that street sweeping is performed regularly and comprehensively in all areas. Development of a Storm Water Pollution Prevention Plan for the City's corporation yard will be performed during the second year. The entire corporation yard will be analyzed with the intent of improving areas such as material storage and containment, vehicle parking, and the protection of storm drain inlets. Also during Yr. 2, a schedule for cleaning storm drain facilities will be developed and implemented.

B. Training

The City will emphasize training for field personnel and good housekeeping of the corporation yard. As a minimum, once-a-year training will be provided to the field personnel about storm water quality and how their actions can have a direct impact on the City's efforts to reduce pollutant infiltration. Crews will be taught the importance of keeping street and storm drain systems clean of trash and debris and the proper handling and clean up of maintenance materials. Parks maintenance and landscaping crews will be educated on the proper and efficient use of fertilizers and pest controls. Sewer employees will receive training on maintenance and cleaning activities to be performed during overflows. This parameter will be measured by the number and percent of employees that receive training.

C. Street Cleaning

The City currently contracts for street cleaning to remove trash and leaf litter from residential streets on a regular basis and in the fall. Street cleaning is effective in diverting materials from drainage channels and creeks. Litter removal will be conducted in public rights-of-way and other public property as needed. In extreme cases, the City can enact an existing Ordinance allowing Code Enforcement officers to require adjacent property owners to clean up litter. Litter is removed that would otherwise be washed into drainage channels and creeks during the rainy season. Spills of paint, oil, and other similar materials from public property are also performed as needed such that these substances would not otherwise be washed into drainage channels and creeks during the rainy season. This parameter will be measured by the number of Code enforcement actions for litter removal and whether or not City streets were swept in the Fall.

D. Storm Water Pollution Prevention Plan for Corporation Yard and Street Operations

A Storm Water Pollution Prevention Plan will be developed and implemented for the City's corporation yard and for street operations. The purpose for the SWPPP will be to have a documented plan for controlling runoff from the corporation yard and for preventing harmful street maintenance debris from entering the City's storm drain system. This SWPPP will be prepared by the end of year 2.

E. Program for Cleaning Storm Drain Facilities

A schedule for cleaning out City-owned storm drain facilities will be developed and implemented by year 2. The schedule will include all major storm drain facilities, including inlets, pipe structures, culverts, outfalls, and basins. The schedule will call for the cleaning of said facilities in the fall prior to the rainy season to prevent trash and debris from entering receiving water bodies during storm events. The cleaning will also help the facilities operate more effectively.

F. Water Utility Discharge Pollution Prevention Plan

Considered a non-storm water discharge, the flushing of water lines and fire hydrants can introduce erosion, turbidity, and chlorine problems for receiving water bodies. The proper

way to address these problems is to establish a Water Utility Discharge Pollution Prevention Plan that governs how City water utility crews handle certain activities like water line flushing and fire hydrant flushing. This BMP will be established in year 4.

TABLE 6 – POLLUNTION PREVENTION/GOOD HOUSEKEEPING

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
6A Operations and Maintenance Program Operation and maintenance practices should be consistent with practices required of the entire community under this Storm Water Plan.	A comprehensive operations and maintenance program for the City's corporation yard and City street and storm drain facilities will provide for the reduction and elimination (where possible) of direct pollutant introduction into the storm sewer system.	In Years 1-5, annually review street sweeping schedule and routes to ensure entire City is swept. Annually inspect sweeping equipment to ensure proper operation.	Yrs. 1-5: Review street sweeping schedules to confirm that street sweeping is performed regularly in all areas. Inspect street sweeping equipment annually	Review of street sweeping schedule is completed and documented. Annual inspection of equipment is completed and documented.	All City streets are swept on schedule. Street sweeping as a practice reduces the amount of litter and debris that can enter the storm drain system.
6B Training Grounds maintenance and landscaping crews should be trained to understand the effects of maintenance activities, including the use of fertilizer, on storm water quality.	Proper training of City grounds and maintenance crews is essential to ensure proper practices and proper use of fertilizers, pesticides and herbicides. Crews should be trained to understand how their practices affect storm water quality.	Training should be held once per year for all grounds maintenance and landscaping staff. Training should address effects on water quality from landscaping and maintenance activities.	Yr. 1: Provide training to all City maintenance staff on the proper handling and clean up of maintenance materials. Parks maintenance and landscaping crews will be educated on the proper and efficient use of fertilizers and pest controls. Sewer employees will receive training on maintenance and cleaning activities to be performed during overflows.	Number and percentage of grounds maintenance staff trained annually.	After receiving training, staff given written quiz to evaluate effectiveness of training.
6B Training Grounds maintenance and landscaping crews should be trained to understand the effects of maintenance activities, including the use of fertilizer, on storm water quality.	Proper training of City grounds and maintenance crews is essential to ensure proper practices and proper use of fertilizers, pesticides and herbicides. Crews should be trained to understand how their practices affect storm water quality.	Training should be held once per year for all grounds maintenance and landscaping staff. Training should address effects on water quality from landscaping and maintenance activities.	Yr. 2: Provide training to all City maintenance staff on the proper handling and clean up of maintenance materials. Parks maintenance and landscaping crews will be educated on the proper and efficient use of fertilizers and pest controls. Sewer employees will receive training on maintenance and cleaning activities to be performed during overflows.	Number and percentage of grounds maintenance staff trained annually.	After receiving training, staff given written quiz to evaluate effectiveness of training.

TABLE 6 – POLLUNTION PREVENTION/GOOD HOUSEKEEPING

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
6B Training Grounds maintenance and landscaping crews should be trained to understand the effects of maintenance activities, including the use of fertilizer, on storm water quality.	Proper training of City grounds and maintenance crews is essential to ensure proper practices and proper use of fertilizers, pesticides and herbicides. Crews should be trained to understand how their practices affect storm water quality.	Training should be held once per year for all grounds maintenance and landscaping staff. Training should address effects on water quality from landscaping and maintenance activities.	Yr. 3: Provide training to all City maintenance staff on the proper handling and clean up of maintenance materials. Parks maintenance and landscaping crews will be educated on the proper and efficient use of fertilizers and pest controls. Sewer employees will receive training on maintenance and cleaning activities to be performed during overflows.	Number and percentage of grounds maintenance staff trained annually.	After receiving training, staff given written quiz to evaluate effectiveness of training.
6B Training Grounds maintenance and landscaping crews should be trained to understand the effects of maintenance activities, including the use of fertilizer, on storm water quality.	Proper training of City grounds and maintenance crews is essential to ensure proper practices and proper use of fertilizers, pesticides and herbicides. Crews should be trained to understand how their practices affect storm water quality.	Training should be held once per year for all grounds maintenance and landscaping staff. Training should address effects on water quality from landscaping and maintenance activities.	Yr. 4: Provide training to all City maintenance staff on the proper handling and clean up of maintenance materials. Parks maintenance and landscaping crews will be educated on the proper and efficient use of fertilizers and pest controls. Sewer employees will receive training on maintenance and cleaning activities to be performed during overflows.	Number and percentage of grounds maintenance staff trained annually.	After receiving training, staff given written quiz to evaluate effectiveness of training.
6B Training Grounds maintenance and landscaping crews should be trained to understand the effects of maintenance activities, including the use of fertilizer, on storm water quality.	Proper training of City grounds and maintenance crews is essential to ensure proper practices and proper use of fertilizers, pesticides and herbicides. Crews should be trained to understand how their practices affect storm water quality.	Training should be held once per year for all grounds maintenance and landscaping staff. Training should address effects on water quality from landscaping and maintenance activities.	Yr. 5: Provide training to all City maintenance staff on the proper handling and clean up of maintenance materials. Parks maintenance and landscaping crews will be educated on the proper and efficient use of fertilizers and pest controls. Sewer employees will receive training on maintenance and cleaning activities to be performed during overflows.	Number and percentage of grounds maintenance staff trained annually.	After receiving training, staff given written quiz to evaluate effectiveness of training.

TABLE 6 – POLLUNTION PREVENTION/GOOD HOUSEKEEPING

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
6C Street Cleaning Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed.	Street cleaning is effective in diverting materials from drainage channels and creeks.	Street cleaning over and above the regular street sweeping program to be completed once in the Fall for all residential streets in the City.	Yr. 1: Provide street cleaning in the Fall and on an as needed basis.	Street cleaning performed and documented.	Number of residential streets cleaned as a percentage of total streets.
6C Street Cleaning Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed.	Street cleaning is effective in diverting materials from drainage channels and creeks.	Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed. Code enforcement actions are also to be measured.	Yr. 2: Provide street cleaning in the Fall and on an as needed basis.	Street cleaning performed and documented.	Number of residential streets cleaned as a percentage of total streets.
6C Street Cleaning Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed.	Street cleaning is effective in diverting materials from drainage channels and creeks.	Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed. Code enforcement actions are also to be measured.	Yr. 3: Provide street cleaning in the Fall and on an as needed basis.	Street cleaning performed and documented.	Number of residential streets cleaned as a percentage of total streets.
6C Street Cleaning Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed.	Street cleaning is effective in diverting materials from drainage channels and creeks.	Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed. Code enforcement actions are also to be measured.	Yr. 4: Provide street cleaning in the Fall and on an as needed basis.	Street cleaning performed and documented.	Number of residential streets cleaned.

TABLE 6 – POLLUNTION PREVENTION/GOOD HOUSEKEEPING

Best Management Practice (BMP)	BMP Justification	Measurable Goals	Implementation	Progress Measurement	Effectiveness Measurement
6C Street Cleaning Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed.	Street cleaning is effective in diverting materials from drainage channels and creeks.	Street cleaning to remove leaf litter from residential streets in the Fall is effective in diverting materials from drainage channels and creeks. Litter removal is conducted in public rights-of-way and other public property as needed. Code enforcement actions are also to be measured.	Yr. 5: Provide street cleaning in the Fall and on an as needed basis.	Street cleaning performed and documented.	Number of residential streets cleaned as a percentage of total streets.
6D Storm Water Pollution Prevention Plan City Corporation Yard to operate under a Storm Water Pollution Prevention Plan	A SWPPP for the City's corporation yard will provide for the reduction and elimination (where possible) of direct pollutant introduction into adjacent storm water system.	Develop and implement a Storm Water Pollution Prevention Plan for the City's corporation yard. This plan will cover street maintenance operations such as pavement repair and street grinding.	Yr. 2: Develop and implement a SWPPP for the City's corporation yard and street operations.	SWPPP prepared and implemented.	Are BMP's from SWPPP in place and maintained?
6E Program for Cleaning Storm Drain Facilities Establish a program for regular cleaning of storm drain facilities. Best if accomplished prior to rainy season.	An annual program for cleaning City storm drain facilities will provide for the reduction and elimination (where possible) of direct pollutant introduction into the storm sewer system.	Develop and implement a schedule of cleaning out of major storm drain facilities in City jurisdiction annually. Cleaning of storm drain facilities should lead up to rainy season.	Yr. 2: Develop and implement schedule for cleaning of storm drain facilities.	Schedule is developed. Major storm drain facilities, such as inlets, pipe structures, culverts, outfalls, and basins are cleaned of trash and debris annually.	Document cleaning at all sites and amount of trash and debris removed.
6F Water Utility Discharge Pollution Prevention Plan Non-storm water discharges to be handled with Water Utility Pollution Prevention Plan.	A Water Utility Pollution Prevention Plan will help eliminate non-storm water discharges resulting from typical water utility operations such as water line flushing and fire hydrant flushing.	Develop and implement a Water Utility Pollution Prevention Plan to be used by City water crews.	Yr. 4: Develop and implement a Water Utility Pollution Prevention Plan.	Plan developed and implemented.	Water utility crews have consistent set of procedures for certain operations that can cause non-storm water discharges. Activities covered in Plan are documented.